14-21

6.50.91

WATER DEPARTMENT

SALTON SEA WATER ELEVATION AND DRAIN WATER QUALITY IMPACTS

NOVEMBER 1994

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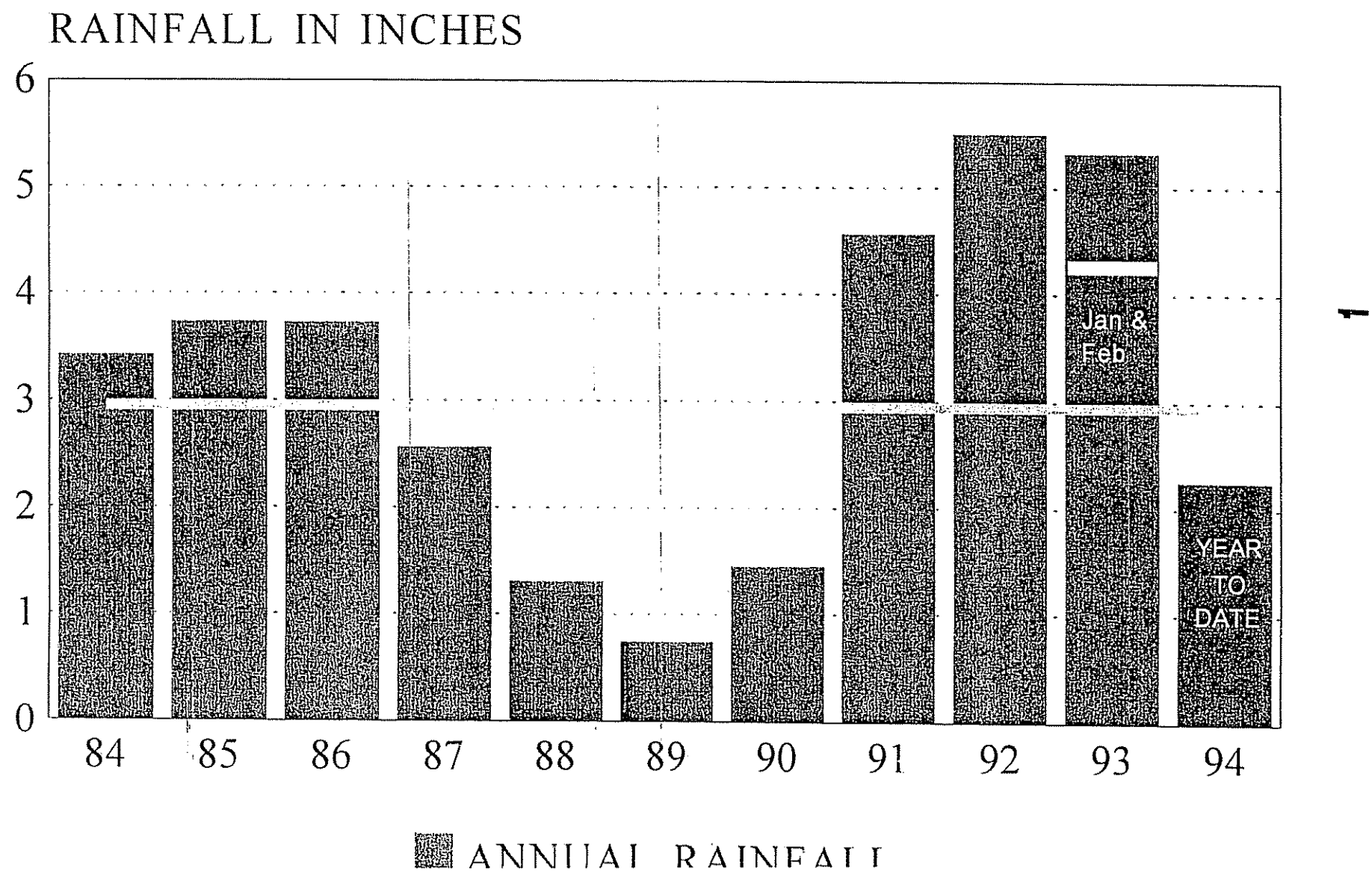
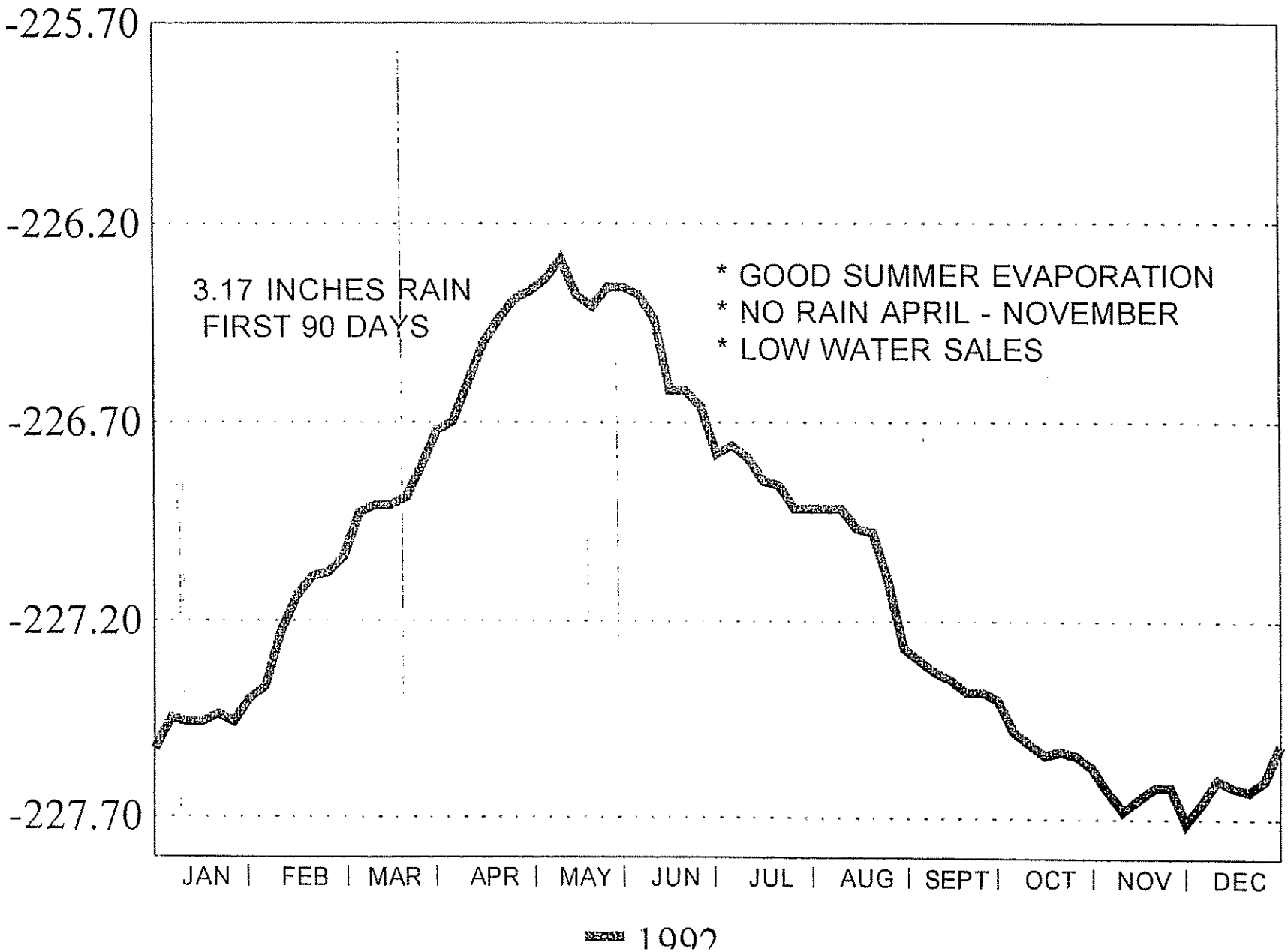
ANNUAL RAINFALL

@ IMPERIAL



Salton Sea @ Fig Tree John



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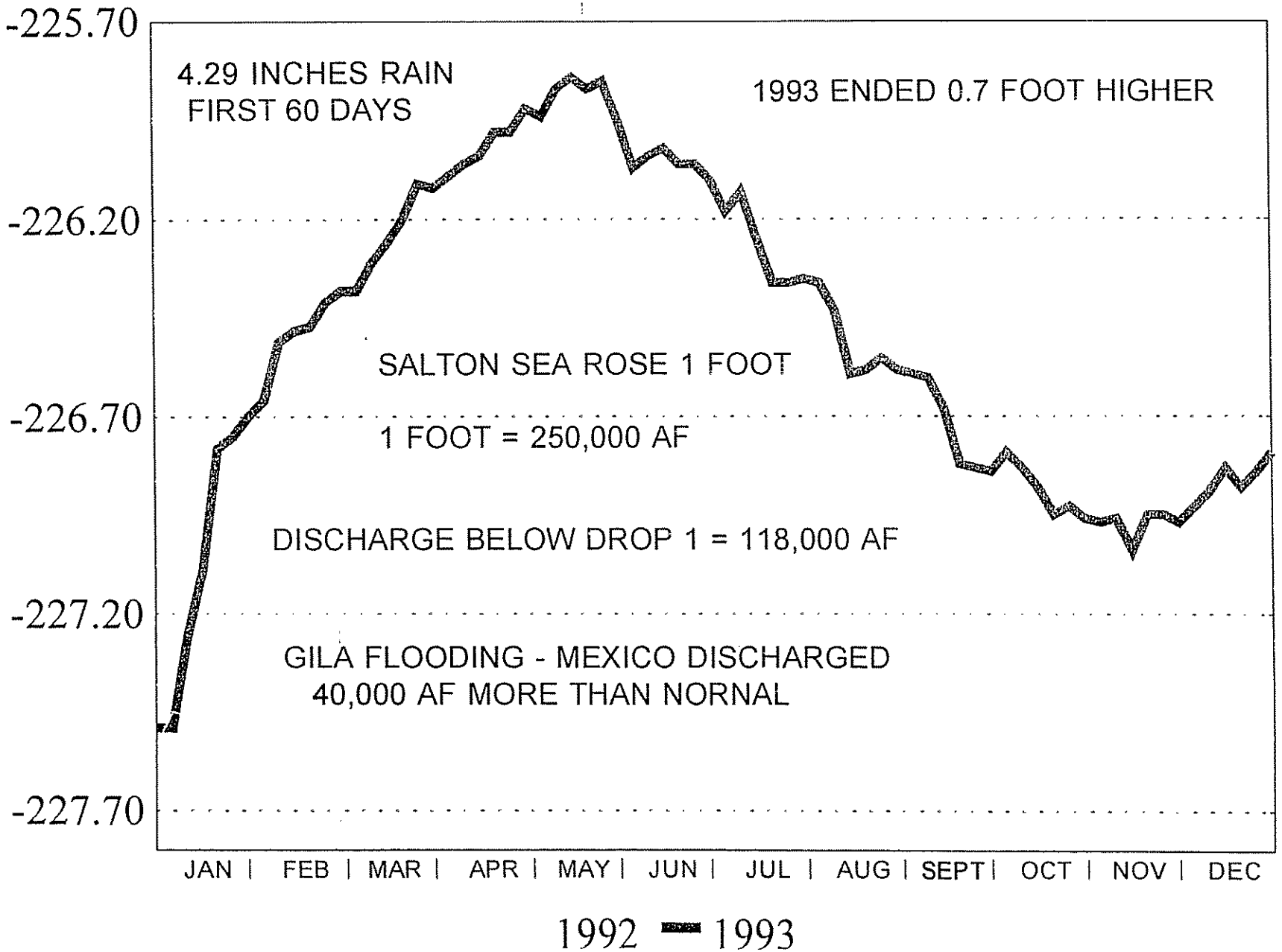

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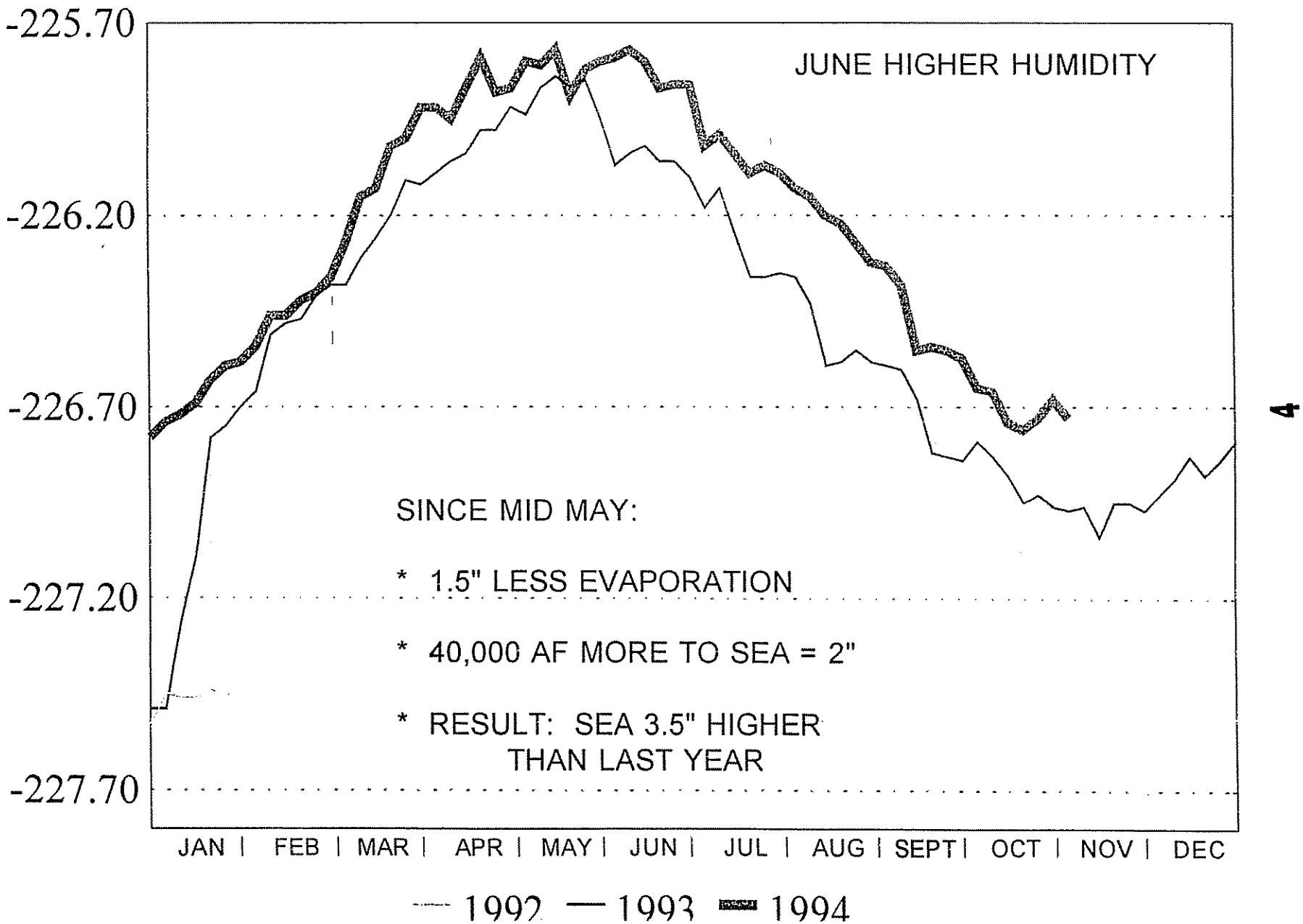


"DRAINS"

IMPACTS:

1. SURFACE
2. SUBSURFACE
3. MAINTENANCE
4. ADDITIONAL PUMPING
5. ON-FARM IMPACTS

"DRAINS"

SOLUTIONS:

1. 23 PUMP STATIONS AT END OF DRAINS TO ALLOW REDUCTION OF COSTS.

"DRAINS"

COSTS:

PUMICE	$ 606,000
VAIL	210,135
21 OTHERS	2,183,865
TOTAL	$3,000,000

"DRAINS"

SCHEDULE:

1. IMMEDIATE START DUE TO CRITICAL LEVELS OF THE SEA.

2. COMPLETE WITHIN TWO YEARS.

"DRAIN"

DREDGING:

1. BUILD UP BANKS
2. COST - PART OF ON-GOING MAINTENANCE
3. SCHEDULE OVER TIME
4. DEPENDENT ON CONCERN

"DIKES"

IMPACTS:

1. LIMITS DISTRICT LIABILITY.

"DIKES"

SOLUTIONS:

1. TAKE OVER MAINTENANCE AND OPERATION OF ALL DIKES.

2. BRING UP TO UNIFORM STANDARD.

"DIKES"

COST:

1. $3,000,000 - RAISE AND PROTECT DIKES

"DIKES"

SCHEDULE:

1. ONE YEAR COMPLETION
2. PRIORITIES:
   - WEST FACING DIKES
   - EAST FACING DIKES
   - BALANCE

SALTSEA.FUL(6)
11/16/94

COST FOR SALTON SEA DRAIN IMPROVEMENTS

DRAIN	CAPITAL COST
Pumice Drain System	$606,000
Vail Cut-Off System	$210,135
Vail 2-A	$ 85,215
Vail 3	$ 85,215
Vail 5	$ 77,500
Vail 5-A	$112,500
Trifolium No. 1 System	$182,810
Trifolium No. 9	$110,745
Trifolium No. 10	$105,915
Trifolium No. 11	$103,615
Trifolium No. 12	$122,300
Trifolium No. 13	$ 82,340
Trifolium No. 14-A	$ 80,905
Trifolium No. 18	$ 80,905
Trifolium No. 19	$ 97,865
Trifolium No. 20	$ 88,725
Trifolium No. 21	$101,315
Trifolium No. 22	$123,030
Trifolium No. 23	$131,080
Trifolium Storm Drain	$102,525
San Felipe Wash	$ 89,875
Poe Drain	$ 82,340
Contingency 5%	$137,145
TOTAL...	$3,000,000

SALTSEA.FUL(6)
11/16/94

DESIGN/CONSTRUCTION SCHEDULE FOR SALTON SEA DRAIN IMPROVEMENTS

DRAIN	MILES	DESIGN COMPLETE	CONSTRUCTION START	CONSTRUCTION COMPLETE
Pumice Drain System	11.00	12/12/94	04/10/95	10/20/95
Vail Cut-Off System	8.5	02/27/95	06/26/95	12/22/95
Vail 2-A	0.75	03/10/95	07/17/95	01/26/96
Vail 3	0.75	03/10/95	07/17/95	01/26/96
Vail 5	2.00	03/24/95	07/31/95	02/23/96
Vail 5-A	1.50	03/24/95	07/31/95	02/23/96
Trifolium No. 1 System	2.00	04/14/95	08/21/95	04/19/96
Trifolium No. 9	1.50	04/14/95	08/21/95	04/19/96
Trifolium No. 10	1.50	04/14/95	08/21/95	04/19/96
Trifolium No. 11	2.00	05/05/95	09/11/95	06/21/96
Trifolium No. 12	2.50	05/05/95	09/11/95	06/21/96
Trifolium No. 13	0.50	05/05/95	09/11/95	06/21/96
Trifolium No. 14-A	0.25	05/05/95	09/11/95	06/21/96
Trifolium No. 18	0.25	05/26/95	10/02/95	08/23/96
Trifolium No. 19	0.50	05/26/95	10/02/95	08/23/96
Trifolium No. 20	0.25	05/26/95	10/02/95	08/23/96
Trifolium No. 21	1.00	05/26/95	10/02/95	08/23/96
Trifolium No. 22	2.00	05/26/95	10/02/95	08/23/96
Trifolium No. 23	1.75	05/26/95	10/02/95	08/23/96
Trifolium Storm Drain	1.00	06/09/95	10/16/95	10/25/96
San Felipe Wash	0.50	06/09/95	10/16/95	10/25/96
Poe Drain	1.50	06/09/95	10/16/95	10/25/96

SALTSEA.FUL(6)
11/16/94

SALTON SEA DIKE IMPROVEMENTS

COST TO UPGRADE DIKES

EARTHWORK	376,000 C.Y. AT $3/C.Y.	$1,128,000
RIPRAP	41,600 C.Y. AT 45/C.Y.	1,872,000
	TOTAL.....	$3,000,000

DESIGN/CONSTRUCTION SCHEDULE

	DESIGN COMPLETED	PROJECT TO BID	CONSTRUCT. START DATE	CONSTRUCT. COMPLETE
REACH 1	02/13/95	03/06/95	04/03/95	12/11/95
REACH 2	03/13/95	04/03/95	06/05/95	12/11/95
REACH 3	04/17/95	05/01/95	07/03/95	12/11/95
REACH 4	05/15/95	06/05/95	08/07/95	12/11/95

SALTSEA.FUL(6)
11/16/94

SALTON SEA DIKE
APPROXIMATE AFFECTED LENGTHS

	LENGTH ALONG DIKE (MILE)
IID	6
ELMORE	8
OTHER	2
TOTAL MILES...	16

SALTSEA.FUL(6)
11/16/94

WHY DO A DRAIN WATER QUALITY PROGRAM?

HORIZON ISSUES:

1. CLEAN WATER ACT REAUTHORIZATION IN PROGRESS

2. COASTAL ZONE ACT REAUTHORIZATION AMENDMENTS OF 1990 MANDATES EPA TO ADDRESS NPS POLLUTION FOR AGRICULTURE (IID IS A TAC MEMBER)

3. INLAND SURFACE WATERS PLAN RE-WRITE IN PROGRESS

4. SELENIUM ISSUE

5. FUTURE EIR/EIS REPORTS IN AREA MUST ADDRESS

CURRENT ISSUES:

1. NON COMPLIANCE WITH REGIONAL WATER QUALITY BOARD'S BASIN PLAN

2. ALAMO RIVER WATER TOXICITY TESTING

3. ENDANGERED SPECIES ACT

4. STORM WATER QUALITY ISSUES

EPA/STATE BOARD/REGIONAL BOARD 3 TIER APPROACH TO ADDRESSING NPS POLLUTION

1. VOLUNTARY APPROACH

2. COMMAND AND CONTROL (WDRs)

3. CEASE AND DESIST ORDER

IMPERIAL IRRIGATION DISTRICT
DRAIN WATER QUALITY IMPROVEMENT PROGRAM

ELEMENTS OF THE PLAN

1. REDUCE SILT LOAD IN THE DRAINS OF IID

   1.1 MEASUREMENT POINT FOR PLAN IS ALAMO RIVER AT THE SALTON SEA

2. IMPLEMENT A WATER QUALITY MONITORING PROGRAM

   2.1 INFLOW MONITORING
   2.2 DRAIN WATER SAMPLING (FOUR DRAINS & TWO RIVERS)
       SOUTH CENTRAL DRAIN AT ALAMO RIVER
       HOLTVILLE MAIN DRAIN AT ALAMO RIVER
       TRIFOLIUM 12 DRAIN AT THE SALTON SEA
       GREESON DRAIN NEAR OUTLET TO NEW RIVER
       ALAMO RIVER AT GARST ROAD
       NEW RIVER AT USGS GAUGING STATION
   2.3 CHRONIC TOXICITY TESTING
   2.4 BIOLOGICAL TESTING
   2.5 SEDIMENT TESTING

3. BEST MANAGEMENT PRACTICES (BMPs) ON FARM

   3.1 IDENTIFY ALL APPLICABLE BMPs WITHIN 3 MONTHS
   3.2 PREPARE WORKPLAN TO TEST & IMPLEMENT 2 BMPs WITHIN 4 MONTHS
   3.3 IF SUCCESSFUL, IMPLEMENT VALLEY WIDE WITHIN REASONABLE TIME PERIOD
   3.4 QUANTIFY RESULTS OF ABOVE

4. BMPs EDUCATION PROGRAM

   4.1 WITHIN ONE YEAR

5. DELINEATION OF MAJOR DRAINS

   5.1 MONITOR FLOW IN TEN LARGEST DRAINS
   5.2 IDENTIFY ALL WATER SOURCES IN DRAIN
   5.3 DELINEATE WATERSHED BOUNDARIES
   5.4 WITHIN ONE YEAR

Estimated Cost

	Year 1	Year 2	Year 3
Sample Analyses	$133,000	$100,000	$100,000
Jones & Stokes	$127,000	$75,000	$25,000
I.I.D.	$160,000	$250,000	$300,000
WATER USER COST	———	*	*
	$420,000	$425,000*	$425,000*

I.I.D. COSTS

Year 1
- Various Staff Time DS, WR, PM, PTS PIO
- Support Services Engr., Drafting, Clerical
- Sampling & Monitoring Equipment

Year 2
- Same As Year 1 but Lesser Demand
- Hire/Reassign 2 Staff Members Full Time
- Develop Operational & Maintenance BMP's Internally

Year 3
- Same As Year 1 but Lesser Demand
- Hire/Reassign Additional Staff To Oversee & Monitor BMP Implementation Program

* Does Not Include Any Money For Installing BMP Programs On-Farm, Off-Farm, In-Stream

IMPERIAL IRRIGATION DISTRICT

Cost of Funding
Salton Sea/Water Quality Projects

Emergency Program
1995 - 1997

Dikes	$3.3M
Pumps	$3.5M
Water Quality	$1.3M
Total	$8.1M

IMPERIAL IRRIGATION DISTRICT

Budget Overview
1995

Revenues $42,300,000

Restricted Reserves 6,000,000

Expenditures 40,900,000

(w/o Salton Sea/drain/water quality projects)

Net Available for Salton Sea projects $1,400,000

Note: Assume same budgets for 1996 & 1997

IMPERIAL IRRIGATION DISTRICT

Funding Options A
1995 - 1997

Normal Operating Budget	$4.2 M
Reserves	$3.9 M
Total for SS/Drains	$8.1 M

Note:
- Lowers the Reserves
- Emergency expenditures
- Lower than budgeted water sales
- No vehicle & equipment replacement
- Lawsuits

IMPERIAL IRRIGATION DISTRICT

Funding Option B
1995 - 1997

Normal Operating Budget	$4.2M
MWD Indirect Funds	$2.7M
(1/2 Interest only)	
Total	$6.9M

Note:

- Short of needed funding
- Principal withdrawal would reduce available reserves for future
- Unexpected contigencies and affect the growth of the Indirect Fund

IMPERIAL IRRIGATION DISTRICT

Funding Option C
1995 - 1997

Normal Operating Budget	$4.2M
$ .50/Acre-Foot Increase	$3.9M
Total	$8.1M

Note:
- Will provide funding for ongoing operation & maintenance
- Will provide long-term funding for water quality contingencies

IMPERIAL IRRIGATION DISTRICT

Schedule of action by the Board at November 22, 1994 meeting

- Staff will recommend $ .50/AF increase in water rate

- Board approval of Three-Year Plan to address emergency measures at Salton Sea and ongoing water quality concerns

14.22

656.021

650.21

IMPERIAL IRRIGATION DISTRICT

MEMORANDUM

TO Acting Manager, Water Dept.

DATE September 21, 1995

FROM Environmental Resources Specialist

COPIES Mr. Clinton
Mr. Remington
~~Mr. Moore~~
MR. KNELL

DEPARTMENT External Affairs

SUBJECT Ag Drain Ponding Project

EA

Attached for your files is a copy of the Final Negative Declaration for the Agricultural Drain Ponding Project, filed with the Imperial County Clerk and the State Clearinghouse on September 8, 1995. The original has been sent to mails and files. The filing of this document completes California Environmental Quality Act requirements. Mr. Remington will continue to work with the Army Corps of Engineers regarding permits for this project. Please phone me (ext. 7245) or Mr. Remington (ext. 7149) with any questions.

Patti Wilson

PATTI WILSON

COPY

So far, this is all covered under 10 agreement

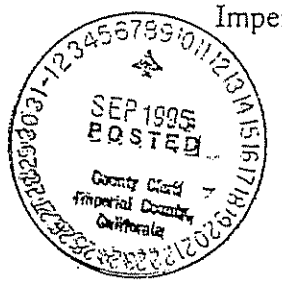
Notice of Determination

Form C

To: X Office of Planning & Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

X County Clerk
County of Imperial
939 Main Street
El Centro, CA 92243

From: Imperial Irrigation District
333 East Barioni Blvd
Imperial, CA 92251



Subject:

Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

Agricultural Drain Ponding Project
Project Title

95071100	Michel D. Remington	619/339-9149
State Clearinghouse Number (If submitted to Clearinghouse)	Lead Agency Contact Person	Area Code/Telephone/Ext

Rural areas of Imperial County
Project Location (include county)

Project Description: As a measure to offset the rising level of the Salton Sea, the Imperial Irrigation District will construct, operate, and maintain six (6) evaporation ponds at the lower end of five (5) agricultural drains prior to their discharging into the New or Alamo Rivers. The ponded water surfaces will range from 15 to 80 acres in size and store anywhere from 30-500 acre-feet per site.

This is to advise that the Imperial Irrigation District has approved the above described project on

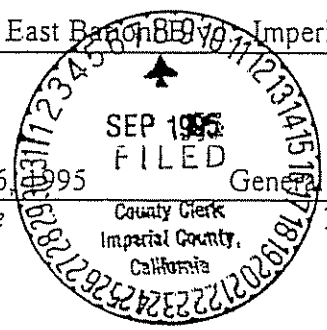
☒ Lead Agency ☐ Responsible Agency

September 5, 1995 *(Date)* and has made the following determinations regarding the above described project:

1. The project [☐ will ☒ will not] have a significant effect on the environment.
2. ☐ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
   ☒ A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [☐ were ☒ were not] made a condition of the approval of the project.
4. A statement of Overriding Considerations [☐ was ☒ was not] adopted for this project.
5. Findings [☐ were ☒ were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval is available to the General Public at:

Imperial Irrigation District, Operating Headquarters, 333 East Barioni Blvd, Imperial, CA 92251



M. J. Clinton — September 6, 1995 — General Manager

Signature (Public Agency) *Date* *Title*

Date received for filing at OPR:

(a:nod.frm)

Imperial Irrigation District

Final Negative Declaration

Agricultural Drain Ponding Project
Imperial County, California
SCH No. 95071100

Imperial Irrigation District
333 East Barioni Blvd.
Imperial, CA 92251

September 1, 1995

Final Negative Declaration

The Proposed Negative Declaration for the Agricultural Drain Ponding Project was prepared for public review in accordance with the California Environmental Quality Act and was circulated through the State Clearinghouse to the appropriate agencies. Copies of the Proposed Negative Declaration were made available at local public libraries and were also mailed directly to adjacent land owners.

The public comment period closed on August 24, 1995. Ten letters were received and are contained in Attachment E of this document. All comments are responded to in Attachment E. In some cases the body of the Negative Declaration has been modified to reflect comments received (identified in italics). This Final Negative Declaration represents the completion of the proposed document and has been prepared in accordance with the California Environmental Quality Act.

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ATTACHMENTS

Attachment A
Initial Study

Attachment B
Site Location Map

Attachment C
Fig Drain Data

Attachment D
IID Drain Water Quality Improvement Program - Monitoring & Reporting Program

Attachment E
Comment Letters and Responses

1.0 Project Description

The Imperial Irrigation District (IID) proposes to construct, operate, and maintain six (6) evaporation ponds at the lower end of five (5) agricultural drains prior to their discharging into the New or Alamo Rivers. The ponded water surfaces will range from 15 to 80 acres in size and store anywhere from 30 - 500 acre-feet per site. Depending on site topography, some sites may have multiple ponds, piggy-backed in succession, to increase water surface area and minimize construction costs.

Embankments for the ponds will be constructed from native upland material(s) found at the project sites It should be understood that these ponds will be constructed as "flow-through" pond systems.

2.0 Project Location

Generally, all sites will be in the historic 1905 floodplain of the New and Alamo Rivers (Attachment B). Ponds would be constructed on lands that historically have been idle or never developed by agriculture within these river bottoms. Ponds would be constructed either on private property under an agreement with IID; on lands owned by IID; or on lands mutually shared by IID and adjacent landowners under an agreement.

Specific sites are (see Attachment B):

- RICE 3 DRAIN - Approximately 58 acres located within portions of Lots 4 & 5 Section 4, portions of Lots 6 & 7 Section 5, and Portions Tract 149, Section 5, all in the New River basin, T. 15 S., R. 13 E.

- ROSE OUTLET - Approximately 76 acres located within portions of N1/2 Tract 171 & E ½ Lot 31, Section 7, and Portions of E1/2 Lot 32, SELENIUM 40 acs. Tract 277, and the SW 40 acs. Tract 170, Section 6, all in the Alamo River basin, T. 14 S., R. 15 E.

- BRYANT DRAIN - Approximately 32 acres located within a portion of W1/2, SW 80 acs. of the Alamorio Tract, T. 13/14 S., R. 15 E.

- JONES DRAIN - Approximately 15 acres located within a portion of Tracts 170. 169-A, Section 3, East of Jones Drain the Alamo River, T. 13 S., R. 14 E.

- GREESON DRAIN @ NEW RIVER - Approximately 32 acres located within a portion of Tracts 166 & 200, Sections 19 & 20, all in the Greeson Drain Basin, T. 16 S., R. 13 E.

- GREESON DRAIN @ SCHANIEL RD. - Approximately forty acres located within a portion of Tract 205, Section 30, a portion of Tract 204, Section 29 & 30, a portion of Lot 27, Section 29, and Lot 4, Section 32, all in the Greeson Drain Basin, T. 16 S.,R. 13 E.

3.0 Project Objectives

The main objective of the proposed Agricultural Drain Ponding Project is to offset the rising level of the Salton Sea, the repository for agricultural drainage in the Imperial and Coachella valleys. *IID has been working in an emergency status since the first of this year in an effort to raise existing dikes surrounding the Salton Sea in order to prevent the further inundation of property. Although the Agricultural Drain Ponding Project is not part of this emergency effort,* the intent of the project is to create a greater surface area for evaporation of drainage water to occur before the water is returned to the New or Alamo Rivers and subsequently into the Salton Sea.

Similar projects that have been constructed by IID in the past are the Fig Drain in the mid -1970s and the Peach Drain Desiltation Demonstration Project in 1992. The Fig Drain Project *was* monitored by the Regional Water Quality Control Board *during the 1980s* and provides important fish and bird habitat *Data from this monitoring is affixed as Attachment C.*

4.0 Discussion of Impacts

The following is a discussion of potential project impacts identified in the Initial Study. Because it has been determined, based upon the Initial Study that the proposed project will not have a significant impact on the environment and requirements have been placed on the project to reduce or avoid identified effects, no specific mitigation measures will be required as a condition of project approval. The discussion has been provided pursuant to Section 15063 (Initial Study) of the CEQA guidelines.

- EARTH. The proposed project will result in excavation and overcovering of soils. Earthwork that will disrupt and displace soils will be required to create drain ponds. It is anticipated that effective embankment heights will range between 2 to 10 feet. Minor soil erosion from wind and water may occur during and after construction. A National Pollutant Discharge Elimination System (NPDES) Stormwater Pollution Prevention Plan will be required because an area greater than five acres will be disturbed by construction. This impact has been determined not to be significant because the total area of impact is minor when compared to the total area within the floodplain.

  The creation of pond embankments and associated excavation to build them will cause a minor change in the local topography and existing surface relief features. This change may have a secondary beneficial impact by converting the low habitat value vegetation to a more valuable marsh environment.

  The Imperial Valley drainage system has a considerable silt load, therefore, ponds on occasion may have to be cleaned due to deposition of silt. This impact is considered insignificant and may be beneficial by reducing the amount of silt load downstream of ponds as well as in the Salton Sea. The IID is currently implementing a Drainwater Quality Improvement Program to address sediment reduction in the drains. This is in cooperation with the Regional Water Quality Control Board

- WATER. The goal of the proposed project is to offset the rising level of the Salton Sea by evaporating water before it enters the Sea, thus creating a change in the amount of surface water in downstream drains (New and Alamo Rivers) and in the Salton Sea. This is considered a beneficial impact

It is anticipated that a secondary benefit would be a measurable improvement in the drain water quality entering the New and Alamo Rivers from these ponded drains. This is supported by the *data collected in the 1980s by the* Regional Water Quality Control Board of the inflow and outflow of the Fig Evaporation Pond currently operating at the outlet of the Fig Drain. *Attachment D contains the Drain Water Quality Improvement Plan (DWQIP), Monitoring and Reporting Program adopted by the IID Board of Directors. All five drains included in this project will be added to the DWQIP. In addition, all ponds will incorporate a bypass system such that no water will flow through the ponds during the cleaning process. This design will eliminate the possibility of downstream environmental impacts that could result from the silt removal operation.*

- PLANT LIFE. Preliminary site surveys indicated that vegetation at all sites is predominantly saltcedar, *Tamarix ramosissima chinensis*, an exotic species which is detrimental to native plant species and decreases habitat value. Other vegetation present at the sites include scattered mesquite and phragmites. Implementation of the proposed project would result in a reduction in the acreage, by flooding, of saltcedar. Although a few mesquite trees would also be flooded and lost, the overall impact is considered beneficial because of the decrease in saltcedar.

  By ponding the proposed sites, a barrier to the normal replenishment of saltcedar may occur, however, this is not considered a significant impact due to the present abundance of the species and its being a non-native species.

- ANIMAL LIFE. Because the proposal will result in the flooding of land, some animals (such as rodents and reptiles) currently inhabiting the site may not be able to abandon the site. However, we believe that creation of these ponds will enhance fishery and bird habitat, by creating nesting, feeding, and loafing sites. *The five drains included in this project have been added to the DWQIP (Attachment D) and will be watched closely for impacts to wildlife.*

- NOISE. The proposed project will generate an increase in existing noise levels in surrounding areas during project construction. All sites are in rural areas. This is not considered a significant impact as construction noise constitutes a short-term effect that will terminate upon completion of project construction. No significant noise receptors are present in the project area. In addition, temporary increases in noise levels are expected to be within normal limits and all equipment will operate under the applicable State of California vehicle noise attenuation standards. Compliance with these standards, as well as the standards imposed by the County of Imperial, will ensure that construction noise impacts on surrounding areas are not significant.

- HUMAN HEALTH. Because the ponds will periodically have to be cleaned due to siltation, people have the potential to be exposed to sediments which may or may not contain some level of chemicals (pesticides, fertilizer, etc.). These sediments are of basically the same composition as the existing soils of agricultural crops within the Imperial Valley. There is no documented evidence of human health effects from sediments cleaned from drains and applied to drain banks. This impact is considered minimal and insignificant. Human contact with drain water through recreation is also a possible impact. However, this is considered an insignificant impact. Agricultural drains in the Imperial Valley have REC1 and REC2 beneficial use designations under the *Water Quality Control Plan for the Colorado River Basin* administered by the Regional Water Quality Control Board, *and are regularly fished. The proposed ponds are at the ends of existing drains where*

potential for contact already exists.

- RECREATION. Creation of these ponds may provide opportunities for fishing and bird watching This is considered an insignificant but beneficial impact.

- CULTURAL RESOURCES. References exist which indicate fishing use of the New River by ancient Yuman or Cahuilla Indians. Some cultural resource artifacts may be present. A Staff member holding a cultural resource survey permit will survey the sites prior to construction. Appropriate agencies will be notified of cultural resource finds.

5.0 Findings

Pursuant to the State of California Public Resources Code and the"Guidelines for Implementation of the California Environmental Quality Act of 1970," as amended, a Draft Negative Declaration is hereby made on the Agricultural Drain Ponding Project.

Based on the attached Initial Study and Environmental Checklist, it has been determined that construction of the proposed project will not have a significant effect on the environment. Requirements have been placed on this project to reduce or avoid all identified effects to a level of insignificance. Therefore, no specific mitigation measures have been placed on the proposed project.

6.0 Public Review

- This environmental document will be filed with the Assistant Secretary to the Board of Directors and posted for public review at the Executive Offices of the Imperial Irrigation District located at 1284 Main Street, El Centro, California, as of July 25, 1995 This document has also been filed with the California Office of Planning & Research, State Clearinghouse, to be distributed to reviewing agencies

- A notice that the Negative Declaration will be considered for approval at the September 5, 1995 regular meeting of the Board of Directors will be published in the Imperial Valley Press prior to that meeting

- This Proposed Negative Declaration is available to the public at the Brawley, Calexico, Calipatria Meyer Memorial, El Centro, Holtville, and Imperial Public libraries

- Members of the public may appear before the Board of Directors to present their views at the August 22, 1995 meeting and also at the September 5, 1995 meeting prior to the Board's determination to approve or disapprove the Negative Declaration and the project.

July 26, 1995
Date Proposed Negative Declaration filed with Assistant Secretary to the Board of Directors

9.7.95
Date Final Negative Declaration filed with Assistant Secretary to the Board of Directors

FILED
SEP 08 1995
DOLORES PROVENCIO, COUNTY CLERK/RECORDER
BY

R. Mc Cullough
for General Manager

Attachment A
Initial Study and Environmental Checklist

Initial Study and Checklist

(To be completed by Lead Agency)

SECTION I.

Title of Proposal: Agricultural Drain Ponding Project

Date Checklist Submitted: July 12, 1995

Agency Requiring Checklist: Imperial Irrigation District

Lead Agency: Imperial Irrigation District

Agency Address: 333 East Barioni Blvd.

City/State/Zip: Imperial, CA 92251

Agency Contact: Michel Remington, Environmental Compliance Coordinator Phone: (619)339-9149

SECTION II.

Project Description: As a measure to offset the rising level of the Salton Sea, the Imperial Irrigation District (IID) is proposing to "pond-up" some of their agricultural drains prior to their discharging into the New or Alamo Rivers. A similar type project was constructed by the IID in the mid 1970's at the outlet of the Fig Drain.

Generally, all sites will be in the historic 1905 floodplain of the New and Alamo Rivers. Ponds will be constructed on lands that historically have been idle or never developed for agriculture within these river bottoms. Ponds would be constructed either on private property under an agreement with IID; on lands owned by IID; or on lands mutually shared by IID and adjacent landowners under an agreement.

Embankments for the ponds would be constructed from native upland material(s) found in these flood plains. It should be understood that these ponds will be constructed as "flow-through" pond systems. That is, the intent is to create greater surface area for evaporation to occur before the water is discharged to the New or Alamo Rivers

Embankment heights will vary depending on the topography of each site. It is anticipated to maintain the effective embankment heights within the range of 2 to 10 feet.

Based on preliminary site investigation work, the effected ponded water surfaces will range from 15 to 100 acres in size and store anywhere from 30-1000 acre-feet per site. Depending on site topography, some sites may have multiple ponds, piggy-backed in succession, to increase water surface area and minimize construction costs

SECTION III. ENVIRONMENTAL IMPACTS:

(As required by CEQA, an explanation of all "yes" and "maybe" answers are provided in Section IV, including a discussion of ways to mitigate the significant effects identified.)

	Yes	*Maybe*	*No*
1. EARTH. *Will the proposal result in:*			
a) Unstable earth conditions or in changes in geologic substructures?			X
b) Disruptions, displacements, compaction or overcovering of the soil?	X		
c) Change in topography or ground surface relief features?	X		
d) The destruction, covering or modification of any unique geologic or physical features?			X
e) Any increase in wind or water erosion of soils, either on or off the site?			X
f) Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?		X	
g) Exposure of people or property to geologic hazards, such as earthquakes, landslides, mudslides, ground failure, or similar hazards?			X
2. AIR. *Will the proposal result in:*			
a) Substantial air emissions or deterioration of ambient air quality?			X
b) The creation of objectionable odors?			X
c) Alteration of air movement, moisture, or temperature, or any change in climate, either locally or regionally?			X
3. WATER. *Will the proposal result in:*			
a) Changes in currents, or the course of direction of water movements, in either marine or freshwaters?			X
b) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?			X
c) Alterations to the course or flow of flood waters?			X
d) Changes in the amount of surface water in any water body?	X		
e) Discharge into surface waters, or in any alteration of surface water quality, including, but not limited to, temperature, dissolved oxygen or turbidity?		X	
f) Alteration of the direction or rate of flow of ground waters?			X
g) Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?			X
h) Substantial reduction in the amount of water otherwise available for public water supplies?			X
I) Exposure of people or property to water related hazards such as flooding or tidal waves?			X

	Yes	Maybe	No
4. PLANT LIFE. *Will the proposal result in:*			
a) Change in the diversity of species, or number or any species of plants (including trees, shrubs, grass, crops, and aquatic plants)?	X		
b) Reduction of the numbers of any unique, rare, or endangered species of plants?			X
c) Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?	X		
d) Reduction in acreage of any agricultural crop?			X
5. ANIMAL LIFE. *Will the proposal result in:*			
a) Change in the diversity of species, or numbers of any species of animals (birds; land animals, including reptiles; fish and shellfish, benthic organisms or insects)?		X	
b) Reduction of the numbers of any unique, rare, or endangered species or animals?			X
c) Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?			X
d) Deterioration to existing fish or wildlife habitat?			X
6. NOISE. *Will the proposal result in:*			
a) Increases in existing noise levels?	X		
b) Exposure of people to severe noise levels?			X
7. LIGHT and GLARE. *Will the proposal:*			
a) Produce new light or glare?			X
8. LAND USE *Will the proposal result in:*			
a) Substantial alteration of the present or planned land use of an area?			X
9. NATURAL RESOURCES *Will the proposal result in:*			
a) Increase in the rate of use of any natural resources?			X
10. RISK OF UPSET. *Will the proposal involve:*			
a) A risk of an explosion or the release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation) in the event of an accident or upset conditions?			X
b) Possible interference with an emergency response plan or an emergency evacuation plan?			X
11. POPULATION. *Will the proposal.*			
a) Alter the location, distribution, density or growth rate of the human population of an area?			X
12. HOUSING. *Will the proposal:*			
a) Affect existing housing, or create a demand for additional housing?			X

	Yes	*Maybe*	*No*
13. TRANSPORTATION/CIRCULATION. *Will the proposal result in:*			
a) Generation of substantial additional vehicular movement?			X
b) Effects on existing parking facilities, or demand for new parking?			X
c) Substantial impact upon existing transportation systems?			X
d) Alterations to present patterns of circulation or movement of people and/or goods?			X
e) Alterations to waterborne, rail or air traffic?			X
f) Increase in traffic hazards to motor vehicles, bicyclists, or pedestrians?			X
14. PUBLIC SERVICES. *Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:*			
a) Fire protection?			X
b) Police protection?			X
c) Schools?			X
d) Parks or other recreational facilities?			X
e) Maintenance of public facilities, including roads?			X
f) Other governmental services?			X
15. ENERGY. *Will the proposal result in:*			
a) Use of substantial amounts of fuel or energy?			X
b) Substantial increase in demand upon existing sources of energy, or require the development of new sources of energy?			X
16. UTILITIES and SERVICE SYSTEMS. *Will the proposal result in a need for new systems, or substantial alterations to the following utilities:*			
a) Power or natural gas?			X
b) Communications systems?			X
c) Water?			X
d) Sewer or septic tanks?			X
e) Storm water drainage?			X
f) Solid waste and disposal?			X
17. HUMAN HEALTH. *Will the proposal result in:*			
a) Creation of any health hazard or potential health hazard (excluding mental health)?		X	
b) Exposure of people to potential health hazards?		X	
18. AESTHETICS. *Will the proposal result in:*			
a) The obstruction of any scenic vista or view open to the public?			X
b) The creation of an aesthetically offensive site open to public view?			X

	Yes	Maybe	No
19. RECREATION. *Will the proposal result in:*		X	
a) Impact upon the quality or quantity of existing recreational opportunities?			X
20. CULTURAL RESOURCES. *Will the proposal:*			
a) Result in the alteration of or the destruction of a prehistoric or historic archaeological site?		X	
b) Result in adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?			X
c) Have the potential to cause a physical change which would affect unique ethnic cultural values?			X
d) Restrict existing religious or sacred uses within the potential impact area?			X
21. MANDATORY FINDINGS OF SIGNIFICANCE.			
a) Potential to degrade: Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X
b) Short-term: Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? (A short-term impact on the environment is one which occurs in a relatively, brief, definitive period of time. Long-term impacts will endure well into the future.)			X
c) Cumulative: Does the project have impacts which are individually limited, but cumulatively considerable? (A project may impact on two or more separate resources where the impact on each resource is relatively small, but where the effect on the total of those impacts on the environment is significant.)			X
d) Substantial adverse: Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X

SECTION IV. DISCUSSION OF ENVIRONMENTAL EVALUATION

The following is an explanation of each "yes" and "maybe" answer, and in some cases a "no" answer checked above, with a discussion of potential effects and project requirements or measures to substantially reduce or eliminate them. Only those questions that require additional explanation are addressed below.

This section is organized by bringing forward and grouping by element all questions checked "yes," "maybe," and in some cases "no." Explanations are given in order as to why each question was answered in this manner. The explanations are followed by a narrative description of environmental impacts, project requirements, general conditions, and measures that will be placed on this project to reduce or eliminate any adverse effects associated with it.

1. Earth. Will the proposal result in: b.) Disruptions, displacements, compaction or overcovering of the soil; c.) Change in topography or ground surface relief features; f) Changes in deposition or erosion of beach sands, or changes in siltation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?

b.) The proposed project will result in excavation and overcovering of soils. Earthwork that will disrupt and displace soils will be required to create drain ponds. It is anticipated that effective embankment heights will range between 2 to 10 feet. Minor soil erosion from wind and water may occur during and after construction. A National Pollutant Discharge Elimination System (NPDES) Stormwater Pollution Prevention Plan will be required because an area greater than five acres will be disturbed by construction. This impact has been determined not to be significant because the total area of impact is minor when compared to the total area within the floodplain

c) The creation of pond embankments and associated excavation to build them will cause a minor change in the local topography and existing surface relief features. This change may have a secondary beneficial impact by converting the low habitat value vegetation to a more valuable marsh environment.

f) The Imperial Valley drainage system has a considerable silt load, therefore, ponds on occasion may have to be cleaned due to deposition of silt. This impact is considered insignificant and may be beneficial, by reducing the amount of silt load downstream of ponds as well as in the Salton Sea. The IID is currently implementing a Drainwater Quality Improvement Program to address sediment reduction in the drains. This is in cooperation with the Regional Water Quality Control Board.

3 Water. Will the proposal result in: d.) Changes in the amount of surface water in any water body; e.) Discharge into surface waters, or in any alteration of surface water quality, including, but not limited to, temperature, dissolved oxygen or turbidity?

d) The goal of the proposed project is to offset the rising level of the Salton Sea by evaporating water before it enters the Sea, thus creating a change in the amount of surface water in downstream drains (New and Alamo Rivers) and in the Salton Sea. This is considered a beneficial impact.

e.) It is anticipated that a secondary benefit would be a measurable improvement in the drain water quality entering the New and Alamo Rivers from these ponded drains. This is supported by the Regional Water Quality Control Board's monitoring of the inflow and outflow of the Fig Evaporation Pond currently operating at the outlet of the Fig Drain.

4 Plant Life. Will the proposal result in: a.) Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, and aquatic plants); c)Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?

a.) Preliminary site surveys indicate that vegetation at all sites is predominantly saltcedar, *Tamarix ramosissima*, an exotic species which is detrimental to native plant species and decreases habitat value. Other vegetation present at the sites include scattered mesquite and phragmites. Implementation of the proposed project would result in a reduction in the acreage, by flooding, of saltcedar. Although a few mesquite trees would also be flooded and lost, the overall impact is considered beneficial because of the decrease in saltcedar.

c) By ponding the proposed sites, a barrier to the normal replenishment of saltcedar may occur, however, this is not considered a significant impact due to the present abundance of the species and its being a non-native species

5 Animal Life. Will the proposal result in: a) Change in the diversity of species, or numbers of any species of animals (birds; land animals, including reptiles; fish and shellfish, benthic organisms or insects)?

a) Because the proposal will result in the flooding of land, some animals (such as rodents and reptiles) currently inhabiting the site may not be able to abandon the site. However, we believe that creation of these ponds will enhance fishery and bird habitat, by creating nesting, feeding and loafing sites

6 Noise. Will the proposal result in: a.) Increases in existing noise levels?

a) The proposed project will generate an increase in existing noise levels in surrounding areas during project construction. All sites are in rural areas. This is not considered a significant impact as construction noise constitutes a short-term effect that will terminate upon completion of project construction. No significant noise

receptors are present in the project area. In addition, temporary increases in noise levels are expected to be within normal limits and all equipment will operate under the applicable State of California vehicle noise attenuation standards. Compliance with these standards as well as the standards imposed by the County of Imperial will ensure that construction noise impacts on surrounding areas are not significant.

17 Human Health. Will the proposal result in: a) Creation of any health hazard or potential health hazard (excluding mental health): b) Exposure of people to potential health hazards?

a. & b) Because the ponds will periodically have to be cleaned due to siltation, people have the potential to be exposed to sediments which may or may not contain some level of chemicals (pesticides, fertilizer, etc.). These sediments are of basically the same composition as the exisiting soils of agricultural crops within the Imperial Valley. There is no documented evidence of human health effects from sediments cleaned from drains and applied to drain banks. This impact is considered minimal and insignificant. Human contact with drain water through recreation is also a possible impact. However, this is considered an insignificant impact as agricultural drains in the Imperial Valley have REC1 and REC2 beneficial use designations under the *Water Quality Control Plan for the Colorado River Basin* administered by the Regional Water Quality Control Board.

19 Recreation. Will the proposal result in: a) Impact upon the quality or quantity of existing recreational opportunities?

a.) Creation of these ponds may provide opportunities for fishing and bird watching. This is considered a insignificant but beneficial impact.

20 Cultural Resources. Will the proposal result in: a) Alteration of or the destruction of a prehistoric or historic archaeological site?

a) References exist which indicate fishing use of the New River by ancient Yuman or Cahuilla Indians. Some cultural resource artifacts may be present. A Staff member holding a cultural resource survey permit will survey the sites prior to construction. Appropriate agencies will be notified of any cultural resource finds.

SECTION V.
DETERMINATION
(To be determined by Lead Agency)

On the basis of this initial evaluation:

a) The proposed project is CATEGORICALLY EXEMPT from CEQA under CLASS(es) _____, and there are no unusual circumstances or specified statutory conditions present which render reliance on such applicable Categorical Exemption(s) unlawful . . . . . ☐

b) I find that the proposed project *could not* have a significant effect on the environment, and
A NEGATIVE DECLARATION will be prepared . . . . . ☒

c) I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the *mitigation* measures described on an attached sheet have been added to the project
A NEGATIVE DECLARATION will be prepared . . . . . ☐

d) I find the proposed project *may* have a significant effect on the environment, and
An ENVIRONMENTAL IMPACT REPORT is required . . . . . ☐

Signature _____ JESSE SILVA
Print Name

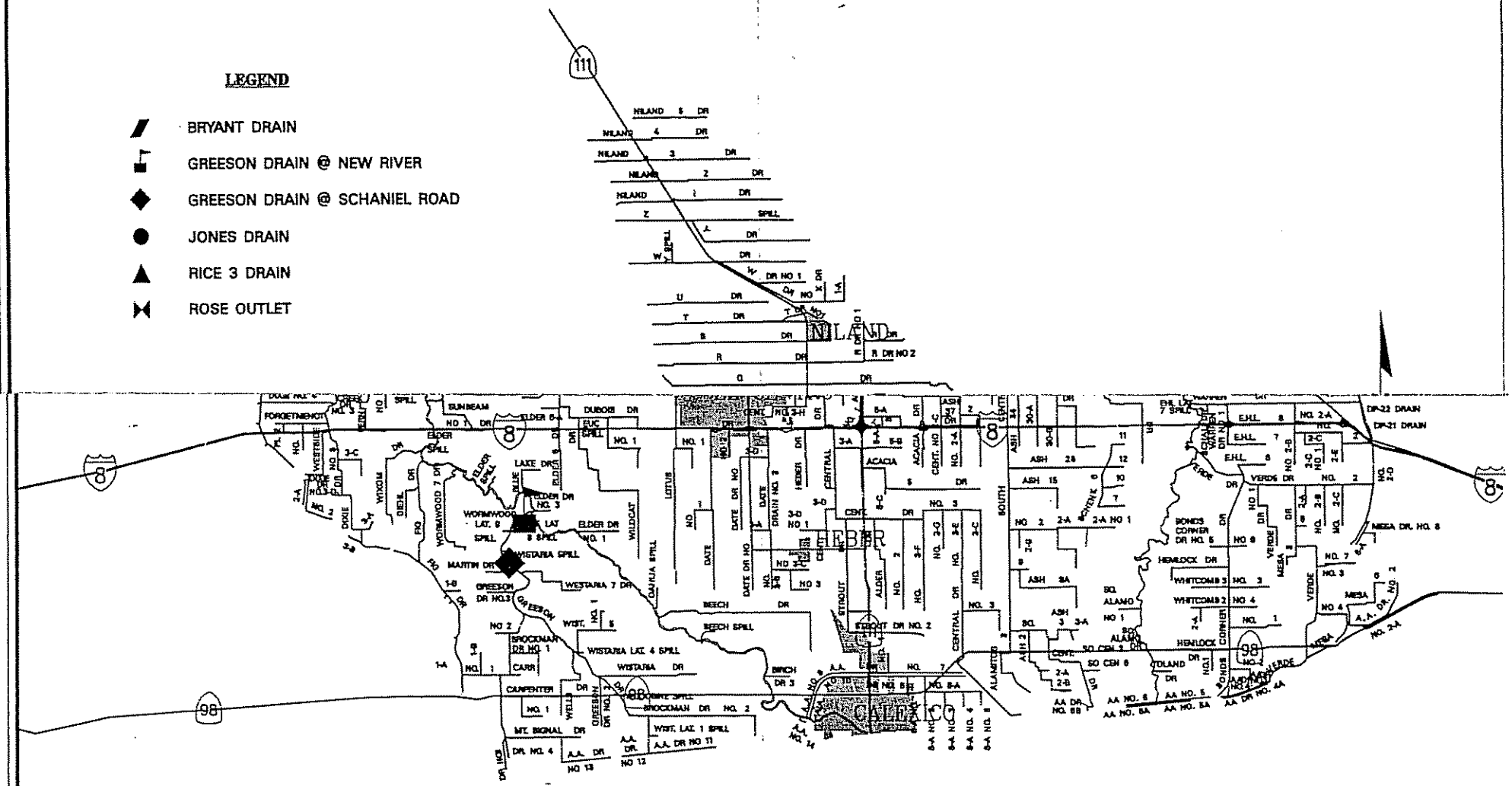
For _____ Date _____

A:PONDCHK LST

Attachment B
Site Location Map

IMPERIAL IRRIGATION DISTRICT

PROPOSED DRAIN PONDING LOCATIONS



Water Department - GIS

Attachment C
Fig Drain Data

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION

WATER QUALITY ANALYSES OF IMPERIAL VALLEY
DRAINAGE FED WETLANDS SYSTEMS
Sampling and Analyses by Regional Board Staff

LOCATION: Fig Drain (Fig Lake Influent)

Date	7-21-82	12-2-82	1-18-83	11-9-83	1-25-84	3-27-84	1-28-85	3-12-85	4-4-85	6-18-85
Temperature °C	25	18	19	22	15	23	19	19	25	27
Field pH		8.0	7.5	7.6	7.7	7.7		8.0	7.9	
Lab pH	7.8						7.9			7.6
Dissolved Oxygen mg/l	6.2	10.5	8.5	8.9	9.2	8.9	11.0	8.4	8.7	9.0
Turbidity NTU	43	19	1100	62	61	85	25	104	31	39
Specific Cond. umhos/cm	2200	2400	2100	1900	1900	1500	1900	1600	1800	1700
Total Diss. Solids mg/l	1300	1490	1300	1460	1310	1260	1232	1082	1244	1242
Suspended Solids mg/l	71	26	2410	124	120	154	39	206	89	62
Vol. Susp. Solids mg/l	4.0	5.2	128	16	<1.0	42	9	20	17	13
Settleable Solids ml/l										
10 Minutes	0.1	0.0	1.2	<0.1	0.3	0.2	0.1	0.5	0.1	0.1
30 Minutes	0.1	0.0	3.5	0.1	0.4	0.2	0.1	0.8	0.2	0.2
1 Hour	0.1	0.0	8.2	0.1	0.6	0.3	0.2	0.9	0.2	0.2
Phosphate PO_4-P mg/l	0.90	0.14	3.07	0.30	0.97	0.82	0.26	0.70	0.36	0.14
Nitrate NO_3-N mg/l	4.0	5.8	5.20	5.2	4.3	4.2	3.48	2.50	3.25	2.75
Nitrite NO_2-N mg/l	<.005	0.028	0.004	0.004	0.012	0.012	0.04	0.00	0.051	0.05
Ammonia NH_3/NH_4-N mg/l	0.2	0.16	0.14	0.10	3.48	0.60	0.13	1.40	0.29	0.13
Kjeldahl Nitrogen mg/l	0.6	0.72	2.07	0.79	3.73	2.09	0.38	10.85	0.34	12.81
COD mg/l	23	17	67	44	37*	16*	17	10	16	142
20°C BOD_5 mg/l					2.4*	4.2*				1
Fecal Coliform MPN/100 ml	1300	20	490	330	230	170	40	1100	220	330

*Filtered

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION

WATER QUALITY ANALYSES OF IMPERIAL VALLEY
DRAINAGE FED WETLANDS SYSTEMS
Sampling and Analyses by Regional Board Staff

LOCATION: Fig Lake Effluent

Date	7-21-82	12-2-82	1-18-83	11-9-83	1-25-84	3-27-84	1-28-85	3-12-85	4-4-85	6-18-85
Temperature °C	30	13	16	21	13	18	15	16	25	32
Field pH		8.5	8.2	8.1	8.2	7.7	7.2	8.3	8.5	
Lab pH	8.0									7.6
Dissolved Oxygen mg/l	17.8	17.1	19.1	15.0	19.0	6.1	16.2	14.2	>20	9.8
Turbidity NTU	34	19	18	24	22	63	19	39	47	23
Specific Cond. umhos/cm	2700	3000	3500	2300	2570	2300	2600	2400	2200	2226
Total Diss. Solids mg/l	1560	1800	2140	1710	1730	1450	1754	1600	1448	1540
Suspended Solids mg/l	9.3	39	34	51	39	126	47	42	118	48
Vol. Susp. Solids mg/l	5.3	12	8.5	19	14	36	29	17	48	22
Settleable Solids ml/l										
10 Minutes	0.1	0.1	0.0	0.0	0.0	0.1	<0.1	0.1	<0.1	<0.1
30 Minutes	0.1	0.1	0.0	0.0	0.0	0.2	<0.1	0.1	<0.1	<0.1
1 Hour	0.1	0.1	0.0	0.0	0.0	0.3	<0.1	0.2	0.1	<0.1
Phosphate PO_4-P mg/l	0.11	0.24	0.29	0.50	0.58	0.39	0.45	0.28	0.30	0.10
Nitrate NO_3-N mg/l	0.8	3.34	4.04	1.6	1.6	1.2	2.08	2.75	0.88	0.38
Nitrite NO_2-N mg/l	<.005	0.094	0.012	0.004	<0.002	0.036	0.11	0.15	0.10	0.04
Ammonia NH_3/NH_4-N mg/l	0.3	0.18	1.58	0.40	0.68	0.54	0.52	0.61	0.18	0.52
Kjeldahl Nitrogen mg/l	1.1	2.44	3.23	2.52	3.13	2.88	1.35	1.21	0.35	4.15
COD mg/l	54	42	48	62	45*	19*	43	44	66	24
20°C BOD_5 mg/l					2.0*	2.7*				8
Fecal Coliform MPN/100 ml	150	<20	50	20	50	20	50	790	490	700

*Filtered

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION

PESTICIDE ANALYSES OF IMPERIAL VALLEY
AGRICULTURAL DRAINAGE FED WETLANDS SYSTEMS

Samples Collected by RWQCB 7 Staff Analyses by Dept. Health Services - L.A.

Date	Location	Pesticide	Results
3-27-84	Fig Lake Effluent	Group I[1]	None detected
3-27-84	Upper Ramer L. Eff.	Group I	None detected
3-12-85	Fig Lake Influent	Group I & V[2]	1.1 µg/l Malathion
3-12-85	Fig Lake Effluent	Group I & V	None detected[3]
3-12-85	Upper Ramer L. Inf.	Group I & V	0.35 µg/l DDE
3-12-85	Upper Ramer L. Eff.	Group I & V	None detected[3]
4-4-85	Fig Lake Influent	Group I & V	None detected[4]
4-4-85	Fig Lake Effluent	Group I & V	None detected[4]
4-4-85	Upper Ramer L. Inf.	Group I & V	None detected[4]
4-4-85	Upper Ramer L. Eff.	Group I & V	None detected[4]
6-18-85	Fig Lake Influent	Group I & V	None detected[5]
6-18-85	Fig Lake Effluent	Group I & V	None detected[5]
6-18-85	Upper Ramer L. Infl.	Group I & V	None detected[5]
6-18-85	Upper Ramer L. Effl.	Group I & V	None detected[5]

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1 Group I pesticides are aldrin, BHC isomers, DDE isomers, DDD isomers, DDT isomers, chlordane, dieldrin, endosulfan isomers, endrin, heptachlor, heptachlor epoxide, hexachlorobenzene, and methoxychlor.

2 Group V pesticides are azinphos methyl, carbophenothion, diazinon, malathion, ethyl parathion, methyl parathion, phorate, and ronnel.

3 <0.2 ppb for Group I pesticides; <0.3 ppb for Group V pesticides.

4 <0.1 ppb for Group I pesticides; <0.2 ppb for Group V pesticides.

5 <0.1 ppb for Group I pesticides; unspecified detection limit for Group V pesticides.

Sampling by Reg. Bd. Staff Analyses by DFG Lab - R. Cordova

COLLECTION DATE : 09/10/85 ST.BD. NO. 723.10.45

LOCATION: FIG LAKE

FISH COMMON NAME: CARP

MEAN FORK LENGTH	(mm) :	434
MEAN WEIGHT	(gm) :	1500.8
AGE ESTIMATE	(yr) :	2-4
# IN THE COMPOSITE (FISH):		4
PERCENT LIPID	FLESH (%):	4.06
PERCENT MOISTURE	FLESH (%):	78.4
	LIVER (%):	N.A.

METALS IN LIVER/FLESH TISSUES
FRESH WT. BASIS (ppm)

		LIVER	FLESH
SILVER	(Ag):	N.A.	N.A.
ARSENIC	(As):	N.A.	N.A.
CADMIUM	(Cd):	N.A.	N.A.
CHROMIUM	(Cr):	N.A.	N.A.
COPPER	(Cu):	N.A.	N.A.
MERCURY	(Hg):	N.A.	N.A.
NICKEL	(Ni):	N.A.	N.A.
LEAD	(Pb):	N.A.	N.A.
SELENIUM	(Se):	N.A.	N.A.
ZINC	(Zn):	N.A.	N.A.

SYNTHETIC ORGANIC COMPOUNDS IN FLESH TISSUE

REPORTED ON:	FRESH WT. BASIS (ppm)	LIPID BASIS (ppm)
1. ALDRIN	<0.005	
2. CIS-CHLORDANE	<0.005	
3. TRANS-CHLORDANE	<0.005	
4. OXYCHLORDANE	<0.005	
5. CIS-NONACHLOR	<0.005	
6. TRANS-NONACHLOR	<0.005	
7. ALPHA CHLORDENE	<0.005	
8. GAMMA CHLORDENE	<0.005	
9. TOTAL CHLORDANE		
10. CHLORPYRIFOS	<0.010	
11. DACTHAL	0.0061	0.15
12. DDD, o,p'	<0.010	
13. DDD, p,p'	0.022	0.54
14. DDE, o,p'	<0.010	
15. DDE, p,p'	0.57	14
16. DDMS, p,p'	<0.030	
17. DDMU, p,p'	<0.015	
18. DDT, o,p'	<0.010	
19. DDT, p,p'	<0.010	
20. TOTAL DDT	0.59	14
21. DIAZINON	<0.050	
22. DICOFOL	<0.10	
23. DICHLOROBENZOPHENONE, p,p'	N.A.	
24. DIELDRIN	0.0064	0.16
25. ENDOSULFAN I	<0.005	
26. ENDOSULFAN II	N.A.	
27. ENDOSULFAN SULFATE	N.A.	
28. ENDRIN	<0.015	
29. ALPHA HCH	<0.002	
30. BETA HCH	<0.010	
31. GAMMA HCH	<0.002	
32. DELTA HCH	<0.005	
33. HEPTACHLOR EPOXIDE	<0.005	
34. HCB	<0.002	
35. PARATHION, ETHYL	<0.010	
36. PCP	N.A.	
37. TCP	N.A.	
38. PCB 1242	N.A.	
39. PCB 1248	<0.050	
40. PCB 1254	<0.050	
41. PCB 1260	<0.050	
42. TOXAPHENE	<0.10	

CODE :119.1.
N.A. = not analyzed
FRESH WT. BASIS= mg/kg of tissue = ppm
LIPID BASIS = mg/kg of lipid = ppm
Compounds listed in Table 10 and not listed above were below detection limits.

Sampling by Reg. Bd. Staff Analyses by DFG Lab - R. Cordov.

COLLECTION DATE : 10/09/85 ST.BD. NO. 723.10.45

LOCATION: FIG LAKE

FISH COMMON NAME: CHANNEL CATFISH

MEAN FORK LENGTH	(mm) :	254
MEAN WEIGHT	(gm) :	204.3
AGE ESTIMATE	(yr) :	1-2
# IN THE COMPOSITE	(FISH):	1
PERCENT LIPID	FLESH (%):	2.10
PERCENT MOISTURE	FLESH (%):	79.2
	LIVER (%):	N.A.

METALS IN LIVER/FLESH TISSUES
FRESH WT. BASIS (ppm)

		LIVER	FLESH
SILVER	(Ag):	N.A.	N.A.
ARSENIC	(As):	N.A.	N.A.
CADMIUM	(Cd):	N.A.	N.A.
CHROMIUM	(Cr):	N.A.	N.A.
COPPER	(Cu):	N.A.	N.A.
MERCURY	(Hg):	N.A.	N.A.
NICKEL	(Ni):	N.A.	N.A.
LEAD	(Pb):	N.A.	N.A.
SELENIUM	(Se):	1.7	N.A.
ZINC	(Zn):	N.A.	N.A.

SYNTHETIC ORGANIC COMPOUNDS IN FLESH TISSUE

REPORTED ON:	FRESH WT. BASIS (ppm)	LIPID BASIS (ppm)
1. ALDRIN	<0.005	
2. CIS-CHLORDANE	<0.005	
3. TRANS-CHLORDANE	<0.005	
4. OXYCHLORDANE	<0.005	
5. CIS-NONACHLOR	<0.005	
6. TRANS-NONACHLOR	<0.005	
7. ALPHA CHLORDENE	<0.005	
8. GAMMA CHLORDENE	<0.005	
9. TOTAL CHLORDANE		
10. CHLORPYRIFOS	0.052	2.5
11. DACTHAL	<0.005	
12. DDD, o,p'	<0.010	
13. DDD, p,p'	<0.010	
14. DDE, o,p'	<0.010	
15. DDE, p,p'	0.088	4.2
16. DDMS, p,p'	<0.030	
17. DDMU, p,p'	<0.015	
18. DDT, o,p'	<0.010	
19. DDT, p,p'	<0.010	
20. TOTAL DDT	0.088	4.2
21. DIAZINON	<0.050	
22. DICOFOL	<0.10	
23. DICHLOROBENZOPHENONE, p,p'	N.A.	
24. DIELDRIN	<0.005	
25. ENDOSULFAN I	<0.005	
26. ENDOSULFAN II	<0.070	
27. ENDOSULFAN SULFATE	<0.085	
28. ENDRIN	<0.015	
29. ALPHA HCH	<0.002	
30. BETA HCH	<0.010	
31. GAMMA HCH	<0.002	
32. DELTA HCH	<0.005	
33. HEPTACHLOR EPOXIDE	<0.005	
34. HCB	0.0032	0.15
35. PARATHION, ETHYL	<0.010	
36. PCP	N.A.	
37. TCP	N.A.	
38. PCB 1242	N.A.	
39. PCB 1248	<0.050	
40. PCB 1254	<0.050	
41. PCB 1260	<0.050	
42. TOXAPHENE	<0.10	

CODE :119.5.
N.A. = not analyzed
FRESH WT. BASIS= mg/kg of tissue = ppm
LIPID BASIS = mg/kg of lipid = ppm
Compounds listed in Table 10 and not listed above were below detection limits.

Attachment D
IID Drain Water Quality Improvement Program
Monitoring & Reporting Program

IMPERIAL IRRIGATION DISTRICT'S
DRAIN WATER QUALITY IMPROVEMENT PLAN
JUNE 7, 1994

INTRODUCTION

The Imperial Irrigation Distinct (IID) receives about 2.8 million acre feet per year of irrigation water for the approximately 500,000 acres of farm land in the Imperial Valley. This irrigation water is from the Colorado River and is brought into the Valley via the All-American Canal. In conjunction with an irrigation network consisting of more than 1600 miles of canals, IID has constructed and operates an agricultural drainage system consisting of about 1450 miles of surface drains. These drains were designed to collect and transport discharge waters consisting of surface and subsurface flows from the agricultural fields of the Imperial Valley and convey them to the Salton Sea.

Waters from sources other than agriculture are also transported by IID's drains and the New and Alamo Rivers into the Salton Sea. These sources include storm water flows, municipal wastewater treatment plant effluent, and industrial effluent discharges. Highly contaminated waters from Mexico enter the Imperial Valley via the New River (about 180,000 AF per year). All the aforementioned discharge sources contribute to the degradation of water quality within IID drains.

The State's Water Quality Assessment document, adopted by the State Water Resources Control Board on May 18, 1992 and by the Regional Board on January 18, 1994, classifies the Alamo River, the New River and the Salton Sea as waterbodies impaired by agricultural nonpoint sources.

On December 21, 1993, the Regional Board's Executive Officer sent a letter to Imperial Irrigation District requesting that IID take "accelerated action to address degraded water quality conditions in Imperial Valley drainage ways". In a letter of response dated January 26, 1994, IID provided to the Regional Board a tentative time schedule for implementation of a proposed "Drain Water Quality Improvement Plan". On April 6, 1994, the Regional Board responded with a letter, addressing elements of concern they considered relevant to the preparation of a Drain Water Quality Improvement Plan. Through a cooperative effort of Regional Board staff, staff members of IID and input from the April 6, 1994 letter, a Drain Water Quality Improvement Plan has been prepared by IID.

DRAIN WATER QUALITY IMPROVEMENT PLAN (Plan)

This Plan is designed to specify those actions that IID will take to protect the beneficial uses of water bodies receiving agricultural drainage flows and the time schedule and estimated cost (enclosed) for implementing those actions. IID has contracted the professional services of Jones and Stokes Associates, Inc. to prepare and initiate many of the technical elements required in the "start-up" of this Plan.

The principle intent of the Plan is to address the immediate and long term needs of the following elements:

Monitoring: Initiate a water quality monitoring program to identify and quantify the extent of drain water pollution within the IID service area.

Best Management Practices: Identify, test and implement Best Management Practices (BMPs), both on and off farm and in-stream, that have the potential to improve the drain water quality within the drainage channels of the IID.

Education: To provide an educational program to farmers within the service area of the IID.

IMPERIAL IRRIGATION DISTRICT
DRAIN WATER QUALITY IMPROVEMENT PLAN
ACTION ITEMS

1.0 SILT LOAD REDUCTION

1.1 This Plan is designed to achieve a reduction in the amount of Total Suspended Solids (i.e. sediment load) that can be discharged by agricultural drain waters. Achievement of this reduction will be determined at the outlet of the Alamo River to Salton Sea. IID recognizes that the Regional Board's current assessment of the average suspended sediment load in the Alamo River is 365 mg/L of Total Suspended Solids (TSS) in the Alamo River at Garst Road Bridge. This information is based on the Regional Board's previous ten years of quarterly sampling at this location.

2.0 BEST MANAGEMENT PRACTICES (BMPs)

2.1 IID will submit to the Regional Board within three months of the date of adoption of this Plan a list of BMPs to improve drain water quality. This list will include descriptions of all relevant BMPs already in use in the Imperial Valley, their effectiveness, their cost, and their applicability for widespread implementation.

2.2 IID will submit to the Regional Board within four months of the date of adoption of this Plan a workplan describing a program to test the pollution prevention ability and cost effectiveness of two of the proposed BMPs noted above. Initial BMPs are to focus on sediment reduction practices on-farm.

2.2.1 IID will submit additional workplans (as described above) for testing of additional BMPs to the Regional Board as needed.

2.2.2 Upon successful testing of BMPs identified in the workplans, and approval of the Regional Board, IID will implement the BMPs valley wide within a reasonable time period.

3.0 BMPs WORKPLAN

3.1 The workplans identified above in 2.2 will contain at least the following:

3.1.1 A detailed technical description of the proposed BMPs, the constituent it is designed to control, the type of crop and the type of irrigation practice that it is applicable to, and any documented history of its use elsewhere.

3.1.2 A testing program designed to quantify the amount of pollution that is prevented from entering surface waters and the cost effectiveness of the BMPs. This will include the use of a control (unaltered) field to measure the baseline discharge of constituents where applicable.

3.1.3 A sampling and analysis plan detailing the type and frequency of needed sampling.

3.1.4 A quality assurance/quality control plan to insure the validity of the testing program.

4.0 BMPs EDUCATION PROGRAM

4.1 IID will submit to the Regional Board within one year of adoption of this Plan a proposal to conduct a BMPs education and outreach program directed to the area's farmers. Upon approval of the Regional Board, the program will be implemented in a timely manner.

5.0 MONITORING

5.1 IID will immediately implement a drain water quality monitoring program (see Appendix A) to identify and quantify drain water pollution within the service area of IID.

5.2 Contained in Appendix A of this Plan are the details of the analyses to be conducted. The monitoring elements shall include:

5.2.1 Inflow Monitoring
5.2.2 Drain Water Sampling Locations
5.2.3 Chronic Toxicity Testing
5.2.4 Biological and Sediment Testing

5.3 IID will retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring, instrumentation and copies of all reports for a period of at least five years from the date of the sample, measurement, or report. Records of monitoring information will include:

5.3.1 The date, exact place, and time of sampling or measurement.
5.3.2 The name of person(s) who performed the sampling or measurement.
5.3.3 The date(s) analyses were performed.
5.3.4 The name of person(s) who performed the analyses.
5.3.5 The results of such analyses.

5.4 All monitoring contained in Appendix A will be evaluated on an annual basis. Constituents with repeated negative or consistently recurring results will be considered for elimination or for sampling on a less frequent basis.

6.0 CHRONIC TOXICITY TESTING

6.1 The initial sampling point for toxicity will be at the outlet of the Alamo River and at a representative inflow location in the All American Canal. If toxicity exceeds established limits at this location, IID will conduct a Toxicity Identification Evaluation (TIE) to determine the chemical(s) that are causing the toxicity.

6.2 IID will submit a report to the Regional Board summarizing the results of the toxicity testing as outlined in IID's Monitoring and Reporting Program (See Appendix A). This report will be submitted February 1, of each year and will include the following information:

6.2.1 A summary of all toxicity testing sample collection and laboratory analyses activities.

6.2.2 A description of any problems encountered during toxicity testing activities, including any deviations from established quality assurance/quality control procedures, and a description of all activities taken to correct past problems and prevent future problems.

6.2.3 An analysis of the testing results to determine the extent of toxicity and the relative sensitivity of the species tested.

6.2.4 Recommendations about the appropriateness of the species tested, the sampling frequency, and the sampling locations.

6.3 At the end of one year of toxicity testing, IID will make a recommendation as outlined in 6.2.4 as to the appropriateness of the species tested and any suggested change/deletion of the three tested species identified in Appendix A, 3.1.

7.0 DELINEATION OF MAJOR DRAINS

7.1 IID will submit a report to the Regional Board within six months of adoption of this Plan that delineates the major discharges into their drain water system. This report will include the following information:

7.1.1 The name, location, and annual discharge volume of the ten largest agricultural drains as measured at their points of discharge to the Alamo River, New River, or Salton Sea.

7.1.2 The sources of water in each of these ten drains will be evaluated to determine the amount of flow contributed from agricultural sources, from storm waters, from municipal wastèwater treatment plants and industrial facilities having NPDES Permits, and from any other significant sources.

7.1.3 The size (in acres) of the contributory watershed of each of the ten drains and a map showing the location of these watersheds.

APPENDIX A

IMPERIAL IRRIGATION DISTRICT
DRAIN WATER QUALITY IMPROVEMENT PLAN
MONITORING AND REPORTING PROGRAM

Imperial Irrigation District will report monitoring data and report to the Regional Board in accordance with the following schedule:

1.0 INFLOW MONITORING

1.1 Water samples from the All-American Canal or other representative inflow locations will be collected quarterly and analyzed for the parameters listed below under "DRAIN WATER SAMPLING".

2.0 DRAIN WATER SAMPLING

2.1 Water samples will be collected monthly from the following locations:

2.1.1 Alamo River at Garst Road Bridge
2.1.2 New River at the USGS gauging station north of Westmorland
2.1.3 South Central Drain near its outlet to Alamo River
2.1.4 Holtville Main Drain near its outlet to Alamo River
2.1.5 Trifolium 12 Drain near its outlet to Salton Sea
2.1.6 Greeson Drain near its outlet to New River

2.2 The six drain water sampling locations listed above will be sampled as follows:

Constituent	Unit	Sample Type
Total Dissolved Solids	mg/L	Grab
Total Suspended Solids	mg/L	Grab
Volatile Suspended Solids	mg/L	Grab
Nitrate (as Nitrogen)	mg/L	Grab
Total Phosphate	mg/l	Grab
Ammonia (NH_3/NH_4^+-N)	mg/L	Grab
Hardness	mg/L	Grab
Boron	µg/L	Grab
Selenium	µg/L	Grab
pH	pH	Grab
Dissolved Oxygen	mg/L	Metered
Flow	cfs	Metered
Fecal Coliform	MPN/100 ml	Grab
Settleable Solids (30 minutes)	ml/L	Grab (field measurement)
Turbidity	NTU	Grab (field measurement)
Temperature	°C	Field Measurement
Specific Conductance	µmhos/cm	Metered

2.3 The collection, preservation, and holding times of all samples will be in accordance with U.S. EPA-approved procedures. All analyses will be conducted by a laboratory certified by the State Department of Health Services to perform the analysis, unless the Regional Board's Executive Officer allows otherwise.

3.0 CHRONIC TOXICITY TESTING

3.1 IID will conduct chronic toxicity testing on grab samples collected quarterly from the Alamo River at Garst Road Bridge and quarterly from the INFLOW MONITORING location (described above). Critical life stage toxicity tests will be conducted using three species as described below:

Species	Effect	Test Duration	Reference
fathead minnow (pimephales promelas)	larval survival and growth stage	7 days	Horning & Weber, 1989
water flea (Ceriodaphnia dubla)	survival; number of young	7 days	Horning & Weber, 1989
alga (Selanastrum capricomutum)	growth test	4 days	Horning & Weber, 1989

3.2 Toxicity Test Reference; Horning, W.B. and Weber,C.I. (eds); 1989. Short Term Methods for Estimating the Chronic Toxicity of Effluent and Receiving Waters to Freshwater Organisms. Second edition. U.S. EPA Environmental Monitoring Systems Laboratory, Cincinnati, Ohio. EPA/600/4-89/001.

3.3 Standard dilution water should be used for these tests. The sensitivity of the test organisms to a reference toxicant will be determined concurrently with each bioassay and reported with the test results.

3.4 Chronic toxicity will be expressed and reported as toxic units (tu_c) where; tu_c = 100/NOEL and the No Observed Effect Level (NOEL) is expressed as the maximum percent effluent of test water that causes no observed effect on a test organism, as determined in a critical life stage toxicity test (indicated above).

3.5 Acute toxicity will be calculated from the results of the chronic toxicity tests described above and will be reported along with the results of each chronic test. Acute toxicity will be expressed as percent survival of the test organisms over the full testing period.

IMPERIAL IRRIGATION DISTRICT
DRAIN WATER QUALITY IMPROVEMENT PLAN
MONITORING AND REPORTING PROGRAM (con't)

4.0 BIOLOGICAL AND SEDIMENT TESTING

4.1 IID will conduct biological and sediment testing as described below:

4.1.1 Biological: Samples of two different aquatic species, including at least one fish species, will be collected each six months from the Alamo River and/or from a large drain tributary to the Alamo River.

4.1.2 Sediment: Bottom sediment samples will be collected at the same time and location as the biological samples described above.

4.2 The biological and sediment samples described above will be analyzed for the following chemicals in accordance with the appropriate established federal and/or state guidelines:

Organics

Aldrin
Chlordene, Alpha
Chlordene, Gamma
Cis-chlordane
Cis-nonachlor
Oxychlordane
Trans-chlordane
Trans-nonachlor
Total Chlordane
Chlorpyrifos
Dacthal
DDD, o,p'
DDD, p,p'
DDE, o,p'
DDE, p,p'
DDMS, p,p'
DDMU, p,p'
DDT, o,p'
DDT, p,p'
Total DDT
Diazinon
Dichlorobenzophenone, p,p'
Dicofol (Kelthane)
Dleldrin
Endosulfan I
Endosulfan II
Endosulfan sulfate
Total Endosulfan
Endrin
HCH, Alpha
HCH, Beta
HCH, Delta
HCH, Gamma (Lindane)
Total HCH
Heptachlor
Heptachlor Epoxide
Hexachlorobenzene
Methoxychlor
Oxadiazon
Parathlon, Ethyl
Parathlon, Methyl
PCB-1248
PCB-1254
PCB-1260
Total PCB
Pentachlorophenol
2,3,5,6-tetrachlorophenol
Toxaphene

Metals

Arsenic	Mercury
Cadmium	Nickel
Chromlum	Selenium
Copper	Silver
Lead	Zinc

5.0 REPORTING

5.1 IID will prepare quarterly reports summarizing all data collected and will submit them to the Regional Board by January 15, April 15, July 15 and October 15 of each year.

Attachment E
Comment Letters and Responses

Comment Letter A

STATE OF CALIFORNIA - CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

PETE WILSON, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN • REGION 7
73-720 FRED WARING DR., SUITE 100
PALM DESERT, CA 92260
Phone (619) 346-7491
FAX (619) 341-6820

August 2, 1995

8/3
Copies to: WD
EA

Michael J. Clinton, General Manager
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

AUG - 7 1995

PW, Bring up at staff mtg. Looked to 8.7

RE: Agricultural Drain Ponding Project- Initial Study and Proposed Negative Declaration

This is in response to your letter of July 26, 1995 requesting comments on your proposed Negative Declaration (as referenced above). Your proposed design for construction and operation of these flow-through evaporation ponds should at a minimum address the following issues:

A-1 Monitoring needs- IID should develop and implement a regularly scheduled, long term monitoring program for these ponds that includes water and sediment monitoring, toxicity testing, and biological testing. Upstream samples, downstream (outlet) samples, and in-pond samples will be needed, but no monitoring more frequent than quarterly should be needed. Each individual pond should be monitored as a pilot project to assess its effectiveness in improving water quality and to identify any impacts to wildlife or aquatic life. This monitoring would be similar to, and in addition to the monitoring program required by IID's Drain Water Quality Improvement Plan, Appendix A (June 7, 1994). Details of a pond monitoring program acceptable to the Regional Board should be agreed upon prior to operation of the ponds.

A-2 The reference to monitoring at the existing Fig Drain Project (p.3) is misleading if it implies that the Regional Board has been regularly monitoring this project. Initial monitoring was done by the Regional Board on this project, but long term, regular monitoring has not been conducted by the Regional Board.

A-3 Pond design- To optimize water quality improvement and enhance wildlife habitat it is strongly recommended that you construct adequate pretreatment facilities for the ponds. These facilities would reduce the impacts caused by the pesticides and silt contained in the drain water collected by the ponds. One possible type of pretreatment system would be desiltation basins operated upstream of the ponds. Unlike the Peach Drain Project, these basins would have to operate with sufficient retention times or utilize other features to allow the finer grained sediments to be removed and they would need to be periodically cleaned out without sending suspended sediments downstream into the ponds. The Regional Board would appreciate the opportunity to work with IID and the affected wildlife agencies in the development of a pond design that benefits rather than limits wildlife habitat and water quality improvement.

Pond operation and maintenance- The extent to which these ponds concentrate salt will potentially be a limiting factor in their operation. As flow-through systems, their design and
A-4 operation should target a salinity level for their discharge which does not exceed the water quality standard for salinity in this area. This standard is 4000 mg/L of Total Dissolved Solids. Not exceeding this limit will also help to minimize the concentration of Selenium in the ponds.

Your proposal to periodically clean the silt out of these ponds (Section 4, p.3) would cause downstream environmental impacts at the time of cleaning and should be reconsidered. If a proper pretreatment system is installed upstream of the ponds, it should remove any need to clean the silt out of the ponds (see above discussion). Your discussion of "Human Health" (p.4) also references cleaning silt out of the ponds and using it for drain bank construction or
A-5 maintenance. Removed silt would be less likely to reenter surface waters if it was reapplied to fields (which is where it originally came from) rather than putting it on drain banks. IID's drain system has been designated by the Regional Board as having recreational beneficial uses. Avoiding potential human health impacts from these projects should be a consideration in their design and operation. The monitoring program mentioned above should provide the type of information needed to show whether human health impacts were at risk of occurring and would provide the basis for implementing corrective actions if a problem did occur.

Project supervision- Based on the experience of your Peach Drain Project it is strongly recommended that you select a single project manager to oversee all aspects of this important undertaking. This project manager should have responsibility for project design,
A-6 operation, and maintenance; monitoring activities and assessment of environmental impacts; environmental compliance and impact remediation; and coordination with all affected agencies.

If designed and operated properly these projects have the potential to provide significant overall water quality improvement in the Imperial Valley watershed and would receive Regional Board support. If there are any questions about this letter, please contact me at (619) 346-7491.

Kenneth Coulter

Kenneth Coulter
Senior Engineering Geologist

cc: Imperial County Board of Supervisors, El Centro, CA
U. S. Fish and Wildlife Service, Salton Sea National Wildlife Refuge, Calipatria, CA
California Dept. of Fish and Game, Long Beach, CA
Karen O'Haire, SWRCB, OCC, Sacramento, CA

File: NPS GC 1.8

Comment Letter B

United States Department of the Interior

BUREAU OF LAND MANAGMENT
California State Office
2800 Cottage Way, Room E-2845
Sacramento, California 95825-1889

3200
CA-923.7

AUG 08 1995

Mr. Michel D. Remington,
Environmental Compliance Coordinator
Imperial Irrigation District
333 E. Barioni Blvd.
Imperial, California 92251

Dear Mr. Remington:

B-1 Thank you for providing this office with an opportunity to review and comment on the Initial Study for the proposed agricultural drain ponding project. Our review indicates that the project will not have an adverse effect on public lands in the general vicinity. As a result, we do not have any specific comments on the Initial Study or the project.

Sincerely,

Leroy Mohorich, Chief
Branch of Energy and Mineral Science
and Adjudication

cc: CA-067

995

External Affairs

Comment Letter C

PLANNING DEPARTMENT

IMPERIAL COUNTY

PLANNING / BUILDING INSPECTION / PLANNING COMMISSION / A.L.U.C. / L.A.F.Co.

Jurg Heuberger – Director

August 11, 1995

Michael D. Remmington
Environmental Compliance Coordinator
Imperial Irrigation District
333 E Barioni Blvd.
Imperial, CA 92251

SUBJECT: Agricultural Drain Ponding Projects

Dear Mr. Remmington:

The Planning/Building Department received on July 31, 1995, a copy of the CEQA initial study and proposed negative declaration for the six (6) projects intending to create approximately, 235 acres of evaporative ponds/settlement ponds at the end of five (5) drains.

C-1 We believe that the project descriptions are vague, misleading, and contradictory and the CEQA initial study and responses are the same. Without accurate project descriptions, site plans, and preliminary drawings, which clearly describe the projects it is impossible to intelligently comment.

C-2 We respectfully request that the Imperial Irrigation District Board of Directors not take action until such time that the public, as required by law, is accurately informed and given proper time to participate in the process.

Sincerely,

JURG HEUBERGER, AICP
Planning Director

BY:

John L. Morrison
Assistant Planning Director

AUG 1995

cc: Wayne Van De Graaff, Supervisor
Bill Cole, Supervisor
Dean Shores, Supervisor
Brad Luckey, Supervisor
Sam Sharp, Supervisor
Richard H. Inman, Sr., County Administrative Officer
Thomas M. Fries, County Counsel
Joanne L. Yeager, Assistant County Counsel
Richard Cabanilla, Planning Division Manager
File 10.105

cc: Eldon Moore
Steve Freel
Mike Kirk

JH/sjs/IID3.DOC

939 MAIN STREET EL CENTRO CALIFORNIA 92243-2856 (COURTHOUSE) (619) 339-4236
FAX NO. (619) 353-8338

Comment Letter D

Salton Sea National Wildlife Refuge
906 West Sinclair Road
Calipatria, CA 92233

August 10, 1995

Michael Remington
Environmental Compliance Coordinator
Imperial Irrigation District

Dear Michael,

Thank you for the opportunity to comment on your proposal to pond agricultural drain water at six locations in the Imperial Valley. While this project stands to substantially increase the fresh water wildlife habitat in the Imperial Valley, we believe that it also carries a responsibility to insure that proper monitoring and maintenance activities are conducted. These activities will ensure nesting birds are not disturbed and most importantly that these areas are not ecological traps concentrating agricultural chemicals in sediments.

D-1 The Fish and Wildlife Service considers water quality an important issue. Water entering these ponds should be reasonably free from high and harmful levels of toxic chemicals. A comprehensive monitoring program should be established which continues for the life of the pond system.

D-2 Another concern centers around the Yuma clapper rail, a federally listed endangered species. The creation of clapper rail habitat would be extremely beneficial, as long as the water source was reasonably free from harmful concentrations of pesticides and herbicides.

By creating these wetlands, there will undoubtedly be cattails, phragmites and perhaps even bulrush becoming established. This will attract clapper rails which appear to readily exploit any suitable fresh water marsh habitat in the Valley. This creates an added responsibility which would require constant water level maintenance and no physical disturbance to the area for the duration of their nesting period. Cooperative agreements between the USFWS and IID could be made to monitor the Yuma clapper rails using these impoundments.

D-3 Botulism is another area of concern which needs to be addressed. Stable water levels are the key to botulism avoidance, especially in the warmer months. Water levels during the fall and winter are of less importance, although care must be taken during this period to keep water circulating to prevent botulism in migrating waterfowl and shorebirds. Creating permanent deepwater ponds (>3')

with continuous circulation may provide an easier way to deal with water level maintenance issues throughout the year.

Removal of sediments and other maintenance operations should be scheduled so as not to conflict with nesting bird species such as the clapper rail. Also, the nature of maintenance operations should be determined. Methods which will be used to control exotic species within these ponds and/or plans to control cattails and other native wetland species in these areas need to be addressed. D-4

Overall, this project could create beneficial wildlife habitat for numerous resident and migratory bird species, including the federally listed Yuma clapper rail. However, concerns over water and sediment toxicity and water control remain. The USFWS would appreciate the opportunity to work with IID and other interested parties on this project.

Sincerely,

Kenneth K. Sturm

Kenneth K. Sturm
Biological Technician

CC:
California Dept. Fish and Game
USFWS Ecological Services-Carlsbad
Regional Water Quality Control

Comment Letter E

CITY OF BRAWLEY

ECONOMIC & COMMUNITY DEVELOPMENT
CITY HALL
400 MAIN ST PLAZA PARK
BRAWLEY CALIFORNIA
92227
PHONE: 344 8622

August 17, 1995

Attn: Michael D. Remington, Environmental Compliance Coordinator
Imperial Irrigation District
333 E. Barion: Blvd.
Imperial, CA 92251

Subject: Initial Study and proposed Negative Declaration for the Agricultural Drain Ponding Project.

Dear Mr. Remington:

E-1 Thank you for giving the City of Brawley the opportunity to comment on said documents. We are pleased to see that the IID will be improving the drain water quality entering the New and Alamo Rivers from these ponded drains.

At this time we do not have any additional comments on the initial study or the proposed negative declaration for this project.

Sincerely,

Jerry Santillan,
City Planner

JS/bva

cc: File

AUG 17 199-

Comment Letter F

ESTABLISHED IN 1918 AS A PUBLIC AGENCY

COACHELLA VALLEY WATER DISTRICT

POST OFFICE BOX 1058 • COACHELLA, CALIFORNIA 92236 • TELEPHONE (619) 398-2651

August 15, 1995

File: 0541.132

Michel D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
Imperial, California 92251

Dear Mr. Remington:

With regard to the Initial Study and Proposed Negative Declaration for the Agricultural Drain Ponding Project, we have the following comments:

F-1 1. Our principal concern is that given the scale of the project the contribution toward the stated objective of offsetting the rising elevation of the Salton Sea will be minimal at best. Assuming an evaporation rate of six feet per year, the proposed 253 acres of ponds will evaporate a total of 1,518 acre-feet of water annually. Out of a total Salton Sea inflow of approximately 1.3 million acre-feet per year, this is only 0.12 percent.

F-2 2. On the other hand if the project were to actually have a discernible impact on inflow to the Salton Sea, it would also have a measurable effect on the Salton Sea's salinity. Nowhere is this acknowledged.

F-3 3. Since the potential effect of the proposed project is so slight, we wonder if it is only the beginning of a larger effort. If the proposed project is in fact only the first in a series of similar projects, a program environmental impact report should be prepared to evaluate the cumulative environmental impact of all agricultural drain pond projects.

F-4 4. Finally, on the initial study checklist, we suggest that items 3a and 3b be changed from "No" to "Yes." Ponding up-flowing drain water certainly qualifies as a change in current (item 3a) and in the drainage pattern (item 3b).

If you have any questions about these comments please contact Dr. Richard Thiery, biologist, extension 326.

Yours very truly,

for Owen McCook
Tom Levy
General Manager-Chief Engineer

RT:dn/el/imperial

TRUE CONSERVATION
USE WATER WISELY

c.c. Moore
Kinnell
Kinney
Kelley

Comment Letter G

State of California — The Resources Agency

Memorandum

Date :

To : 1. Project Coordinator
Resources Agency

2. Mr. Michel D. Remington
Imperial Irrigation District
333 East Barioni Boulevard
Imperial, California 92251

From : Department of Water Resources

Subject : SCH #95071100
Proposed Negative Declaration
Agricultural Drain Ponding Project
Imperial County

The Division of Safety of Dams has completed the review of the Proposed Negative Declaration dated July 19, 1995 for the proposed Agricultural Drain Ponding Project.

G-1 Based on the information provided, some of the proposed six evaporation ponds described in the Proposed Negative Declaration could fall under the jurisdiction of the Department of Water Resources, Division of Safety of Dams. Pursuant to Part 1 of Division 3 of the California Water Code, dams 25 feet or higher having a reservoir storage capacity of more than 15 acre-feet and dams higher than 6 feet having a capacity of 50 acre-feet or more would fall under State jurisdiction. If any of the proposed evaporation ponds fall under our jurisdiction, a construction application must be filed and all dam safety related issues resolved prior to approval of the application.

Thank you for the opportunity to review and comment on the Proposed Negative Declaration.

If you have any questions, please contact Field Engineer Mutaz B. Mihyar at (916) 323-1116 or Regional Engineer Richard Sanchez at (916) 322-6206.

Vernon H. Persson, Chief
Division of Safety of Dams
(916) 445-7606

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Field Office
2730 Loker Avenue West
Carlsbad, California 92008

August 24, 1995

Michel Remington
Imperial Irrigation District
Operating Headquarters
P.O. Box 937
Imperial County, California 92251

Re: Initial Study and Proposed Negative Declaration for the Agricultural Drain Ponding Project, Imperial County, California

Dear Mr. Remington:

The U.S. Fish and Wildlife Service (Service) has reviewed the Public Notice of Availability, Initial Study, and Proposed Negative Declaration dated July 26, 1995 for the referenced project in Imperial County, California. The primary concern and mandate of the Service is the protection of the fish and wildlife resources and their habitats. Our mandate further requires that we provide comments on any public notices issued for a Federal permit or license affecting the nation's waters (e.g., Clean Water Act, Section 404 and River and Harbor Act of 1899, Section 10). The Service is also responsible for administering the Endangered Species Act of 1973, as amended.

The proposed project will involve the construction, operation, and maintenance of six evaporation ponds at the lower end of five agricultural drains prior to their discharge into the New and Alamo Rivers. Earthen levees will be constructed in the drains to restrict water flows and increase the acreage of open water.

The proposed project is located in or near potential and possibly occupied habitat for the federally listed endangered desert pupfish (Cyprinodon macularius) and Yuma clapper rail (Rallus longirostris yumanensis). The flat-tailed horned lizard (Phyrnosoma mcallii), a species proposed for federal listing, may also occur in the project area. The Service also considers the wetland and adjacent upland habitats in the vicinity of the existing agricultural drains as important habitats for other sensitive species including breeding migratory birds. The presence or absence of these and other sensitive species within the project site should be documented and included in any biological assessments or impact reports required for this project.

H-1

The Service also has several concerns relative to environmental contaminants in the creation of evaporation ponds at the ends of agricultural drains that discharge into the New or Alamo River. The ponds are likely to be attractive to wildlife, and if the ponds act as a source of contaminant collection or concentration, there is the potential for the ponds to become attractive hazards. The proposed negative declaration does not adequately support the contention that overall drain water quality will be improved by the ponding before its entering the New or Alamo Rivers. Water quality data on the Fig Drain pond [subsequently made available to the Service by Imperial Irrigation District (IID)] did not provide information to evaluate the potential hazard for several contaminants of concern, particularly selenium, organochlorines, and organophosphate pesticides.

H-2

There is potential for selenium and organochlorine pesticides to concentrate in the sediments and food chains of the evaporation ponds. Depending upon the contaminant loads in the drains and the evaporation rates of the ponds, there is the potential to create wetland areas that are of higher contamination than currently exist in those drainages. This hazard will probably be less (particularly for selenium) if the ponds are operated as a flow-through system, but it will be necessary to monitor and document the contaminant risks associated with the ponds.

It has already been documented that fish and wildlife resources living the Imperial Valley drainages have body burdens that are at levels of concern for selenium and organochlorine contamination, and some individual animals, or their eggs, have had levels of those contaminants that impair reproductive success (Setmire et al. 1993). Because there is a very small margin between safe and toxic amount of selenium in animal diets, the addition of a few ponds that present a greater-than-current risk could be significant in terms presenting a greater overall hazard to wildlife that inhabit the area. It should be noted that in the Tulare Lakebed Area of California, where selenium in drainwater evaporation ponds presents a hazard to migratory birds, requirements mandate the development of clean wetlands as mitigation habitat.

H-3

Organophosphate and carbamate pesticides are a second group of chemicals that could be hazardous to non-target fish and wildlife in an evaporation pond situation. The work recently conducted by the California State Water Resources Control Board (1994) indicates that biotoxicity frequently exists in the Alamo River associated with the seasonal applications of malathion, diazinon, chlorpyrifos, carbofuran and carbaryl. Without any further information, there is also concern that there would be biotoxicity in the drainwater that enter the evaporation ponds.

It is the Service's understanding that chemical monitoring of water, sediment and biota is planned by IID for the evaporation

ponds, and that it would be similar to the District's drainwater quality improvement plan. The Service is interested in more information about how the planned ponds would be monitored, and how chemical risk assessments relative to the ponds would be accomplished, should the pond construction proceed.

H-4 The Service recommends that the applicant contact the U.S. Army Corps of Engineers to determine if a wetland delineation is required. If it is determined that the proposed project site supports jurisdictional waters of the United States or wetlands, the Service intends to provide additional comments pursuant to the Clean Water Act.

We appreciate the opportunity to comment on your proposed project. If you have specific questions regarding contaminant issues, please contact Jewel Bennett of the Environmental Contaminants Branch of my staff at (619) 431-9440. Questions concerning wetlands and endangered species should be directed to Jeff Manning and John Bradley respectively at the same telephone number.

Sincerely,

for Gail C. Kobetich
Field Supervisor

#1-6-95-TA-317

cc:
* Corps Regulatory, LA, CA (Bruce Henderson)
* Salton Sea National Wildlife (Clark Bloom)
* CDF&G, Region 5, Indio, CA (Sharon Keeney)
* California Regional Water Quality Board (Philip Gruenberg, Colorado River Basin Region)
* Bureau of Reclamation (Jim Setmire)

Literature Cited

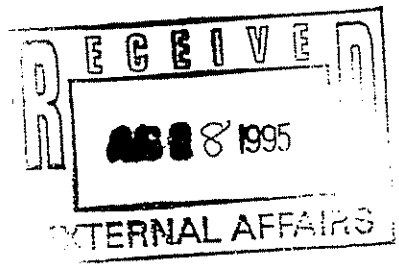
Setmire, J.G., R.A. Schroeder, J.N. Densmore, S.L. Goodbred, D.J. Audet, and W.R. Radke. 1993. Detailed study of water quality, bottom sediments, and biota associated with irrigation drainage in the Salton Sea area, California, 1988-90. U.S. Geological Survey, Water Resources Investigation Report 93-4014. 102 pp.

State Water Resources Control Board. 1994. Colorado River Basin Toxicity Report, March 1993-February 1994. Sacramento, CA.

addresses for cc:

* Colorado River Regional Water Quality Board (Philip Gruenberg, 73-720 Fred Waring Dr., Suite 100, Palm Desert, CA 92260)

* Bureau of Reclamation (Jim Setmire, BOR, PO Box 849, Temecula, CA 92593)



STATE OF CALIFORNIA—THE RESOURCES AGENCY PETE WILSON, Governor

DEPARTMENT OF WATER RESOURCES
P O BOX 29068
GLENDALE, CA 91209-9068

AUG 25 1995

Mr. Michael D. Remington
Environmental Compliance Coordinator
Imperial Irrigation District
333 E. Barioni Blvd.
Imperial, California 92251

Dear Mr. Remington:

The Department of Water Resources wishes to thank the Imperial Irrigation District for the opportunity to comment on the Proposed Negative Declaration for the Imperial Irrigation District's Agricultural Drain Ponding Project. We hope that our comments will be beneficial to you.

In general, our main concern with the Negative Declaration is its lack of information on inflow drainwater quality and sediment quality and the potential for significant impacts to the biotic environment by the bio-accumulation of selenium or other trace elements within the food web. The water quality and sediment quality information is critical in determining whether or not significant impacts might occur as a result of the project and to monitor compliance with project requirements and mitigation measures.

Specific comments on the Negative Declaration and the Initial Study/Checklist are as follows:

Negative Declaration

I-1 Page 2, Section 1.0: The ponds are described as ranging in size from 15 to 80 acres and in capacity from 30 to 500 acre-feet. This is inconsistent with the Initial Study (Appendix A, Section II) which states the ponds will range from 15 to 100 acres in size and have a capacity from between 30 to 1000 acre-feet per pond.

I-2 Page 2, Section 2.0: This section refers to Attachment A twice when Attachment B is probably the correct reference.

I-3 Page 3, Section 3.0: Additional clarification is needed on why the rise in the Salton Sea must be offset. The mention of monitoring of the Fig Drain Project by the Regional Water Quality Control Board suggests that information is available on a similar project. If this is correct, that data should be presented or referenced by this report.

Page 3, Section 4.0, Subsection Earth: The creation of over 250 acres of ponding basins that will probably require periodic sediment removal seems to indicate a significant disturbance to
I-4 the soil. The preparation and implementation of a National Pollutant Discharge Elimination System (NPDES) Stormwater Pollution Prevention Plan should mitigate any potentially significant impacts, but without this, the potential for significant impacts remain. In addition, impoundment of water will affect the soil and its structure. This may not be a detrimental impact, but without data on inflow drainwater quality and sediment analysis of similar projects (Fig Drain) a determination cannot be made on the potential for significant impacts. If the sediment does become hazardous, then sediment removal will be more complex and expensive than indicated.

The mention of the implementation of the Drainwater Quality Improvement Program indicates that data is available on drainwater quality. If so, this information should be made available or referenced as discussed above.

Page 3, Section 4.0, Subsection Water: As stated before, the need to offset the rising of the Salton Sea needs to be
I-5 clarified. The contention that drain water quality entering the New and Alamo Rivers will be improved should be supported by data or by a specific reference that can be verified.

Page 4, Section 4.0, Subsection Animal Life: The first sentence is not clear. If you mean that some animals will drown due to flooding, then say that. The enhancement of fishery and bird
I-6 habitat cannot be adequately determined without water quality information. As has been well documented by the Untied States Fish and Wildlife Service and others at both Kesterson Reservoir and the Tulare Lake Basin, agricultural drainage evaporation ponds can be hazardous to waterfowl.

Page 4, Section 4.0, Subsection Human Health: Similar to the above comment on animal life, impacts to human health are
I-7 difficult to determine without water quality and potential sediment quality information. If selenium or other trace elements are bio-accumulated within the food web, consumption of higher trophic level animals by humans can be potentially hazardous.

Page 5, Section 5.0: The finding that specific mitigation measures are not required does not agree with the previous
I-8 statements that "requirements have been placed on this project to reduce or avoid all identified effects..." It would seem that the inclusion of "requirements" is equivalent to the inclusion of mitigation measures and would necessitate the inclusion of a monitoring plan.

Attachment A, Initial Study and Checklist, Section III

1. Earth, f): If there is a "considerable silt load" in the
I-9 drainage system, then ponding water will cause a change in siltation within the streams feeding the Salton Sea or the Salton Sea itself.

3. Water, e): The ponding of drainwater will have an effect on the water quality of the water as it leaves the ponding basin due
I-10 to both evapo-transpiration and biological processes that occur within wetland areas. The explanation included indicates that this project will at least result in the change of the overall water quality entering into the New and Alamo Rivers.

5. Animal Life, a): There will be a change in the number of animals and/or species if terrestrial species are flooded and
I-11 aquatic species are attracted. Again, the explanation included with the checklist seems to agree that "yes" is a more appropriate answer than "maybe".

5. Animal Life, d): The change from terrestrial to aquatic habitat is a loss of terrestrial habitat with a corresponding
I-12 change in the number and diversity of species. It may be true, though, that the creation of aquatic habitat, if it is clean, may be an overall improvement for aquatic species.

19. Recreation, a): There seems to be a typographical error in this section. The "No" box was checked in response to the
I-13 question on recreational impacts, however, the discussion on this issue would correspond with "Maybe", as was checked above.

21. Mandatory Findings of Significance, a): As stated above,
I-14 without the proper water quality information available, it is not possible to determine impacts to waterfowl and other animals that may use these ponding basins.

21. Mandatory Findings of Significance, c): With the current threats to migratory birds from selenium and other trace elements
I-15 that are occurring in numerous locations along the Pacific Flyway, there is a potential for these ponding basins to contribute to cumulative impacts. Again, data on water quality of the drains and the expected water quality within the ponds are essential to determine the likelihood of cumulative impacts.

If you have any questions regarding our comments, please contact David Inouye at (818) 543-4600, extension 295.

Sincerely,

for Charles R. White, Chief
Southern District

Comment Letter J

City of Imperial

INCORPORATED 1904

August 24, 1995

Michael J. Clinton,
General Manager
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

RE: Mitigated Negative Declaration Agricultural Drain Ponding Project

Dear Mr. Clinton:

Thank you for giving us the chance to review the initial study and proposed negative declaration for the above project. Based on the environmental
J-1 checklists prepared by your staff, it appears that this project will not have significant harmful effect to the City of Imperial or Imperial Valley as a whole. On the other hand, the project will provide beneficial impact by creating ponds for fishing and recreational facilities.

Should you have any questions, please call Harold Phelps at 355-1152.

Sincerely,

Bayani I. Mauricio
Director of P.W./Planning

BIM/sr
cc: City Council
City Manager
City Planner

cc EA (Brannigan)
WD

CITY HALL
420 South Imperial Avenue
Imperial, California 92251-1637
Telephone (619) 355-4371
Fax (619) 355-4718

RECEIVED
AUG 28 1995
GENERAL MANAGER

PUBLIC WORKS / PLANNING / BUILDING
400 South Imperial Avenue
Imperial, California 92251
(619) 355-1152 Planning
(619) 355-1064 Building
Fax (619) 355-1251

8/28/95

Response to Comments
Agricultural Drain Ponding Project
Negative Declaration

Letter A **California Regional Water Quality Control Board (RWQCB) - Region 7**

A-1 The constructed ponds will be incorporated into IID's drain water quality monitoring program A monitoring plan tailored for the needs of the ponds will be developed with the RWQCB before activating the ponds

A-2 Comment noted. Reference to the RWQCB monitoring has been revised in the text of the Negative Declaration, and monitoring results are included as Attachment C.

A-3 The primary purpose for the construction of the ponds is two fold: Their purpose is to.

1. provide additional surface evaporation area for agricultural drain water prior to the drain water reaching the Salton Sea; and

2. to provide a settling area to reduce sediment loading to the rivers along with increasing detention time for the breakdown of associated residual and soluble pesticides prior to entering the rivers.

The ponds as a whole should be considered treatment systems. The RWQCB's request to have pretreatment to the treatment pond is inappropriate. However, in the interest of economical maintenance, the ponds will incorporate a primary settling area near the inlet to facilitate easy removal of as much sediment as possible. This does not preclude the possibility that the ponds will need to be drained in the future and sediment removed on a large scale.

A-4 As flow-through ponds, we feel the not-to-exceed standard of 4000 mg/l for Total Dissolved Solids is an achievable criterion. An eighteen drain survey conducted by USGS in 1994 indicated that the median TDS level was around 2045 mg/l.

A-5 All the ponds will incorporate a bypass system such that no water will flow-through the ponds during the cleaning process This design will eliminate the possibility of downstream environmental impacts that could result from the silt removal operation

A-6 The RWQCB's request to assign a project manager that has oversight control for the project design process, the operation and maintenance activities, the monitoring activities, the data analysis, and the environmental issues concerning assessment, impacts, and impact remediation are difficult to comply with under IID's

organizational structure The General Superintendent of Drainage at IID can be established as a liaison for issues associated with these ponding projects should an issue arise.

Letter B **U.S. Bureau of Reclamation**

B-1 No response is required.

Letter C **Imperial County Planning Department**

C-1 Comment noted.

C-2 The California Environmental Quality Act requires a 30 day public comment period. The Proposed Negative Declaration was approved for distribution on July 25, 1995 and the 30 day public comment period closed on August 24, 1995. A public hearing was held on August 22, 1995. The IID Board of Directors will considered the Final Negative Declaration along with comments received during the comment period prior to approving the document.

Letter D **Salton Sea National Wildlife Refuge**

D-1 The constructed ponds will be incorporated into the IID's drain water quality monitoring program. A monitoring plan tailored for the needs of the ponds will be developed with the RWQCB before activating the ponds.

D-2 We believe that cattail habitat will be marginal due to the depth of the ponds as has occurred with the Fig Evaporation Pond. Should use of the ponds by Yuma Clapper Rail occur, cleaning/maintenance activities will be restricted to non-nesting months and possible cooperative agreements with USFWS will be explored.

D-3 All ponds are designed as flow-through systems, and will incorporate a bypass system such that no water will flow through the ponds during the cleaning process. This design will allow for water to be drained from ponds (not evaporated to dryness or stagnate thus lending to botulism) while a separate water source is present. It will also eliminate the possibility of downstream environmental impacts that could result from the silt removal operation.

The five drains associated with this project have been added to the IID's Drain Water Quality Improvement Plan (DWQIP). Biological and sediment testing are included in the DWQIP's monitoring and reporting program as well as toxicity testing of the drain water. A complete copy of the DWQIP will be forwarded to USFWS.

D-4 See response D-2

Letter E **City of Brawley**

E-1 No response necessary

Letter F **Coachella Valley Water District**

F-1 Comment noted

F-2 IID agrees that the ponding projects alone will not have a significant impact in lowering the Salton Sea. Therefore, it is acknowledged that there will not be a significant increase in the salinity of the Salton Sea. As flow-through ponds, we feel the not-to-exceed standard of 4000 mg/l for Total Dissolved Solids set by the RWQCB is an achievable criterion.

F-3 IID has not committed to any additional drain ponding projects beyond the scope of this Initial Study. As such, a Program environmental impact report is not required.

Letter G **Department of Water Resources - Division of Safety of Dams**

G-1 At this time it is anticipated that pond embankments will not exceed a height of 6 feet. Upon final design, should embankments exceed 6 feet, the Division of Safety of Dams will be contacted to determine if these agricultural ponds fall under its jurisdiction.

Letter H **U.S. Fish & Wildlife - Ecological Services**

H-1 The predominant vegetation in all of the ponding sites is Salt Cedar (*tamarix chinensis*). Based on site visits by IID staff and a visit to one of the sites with California Fish and Game personnel, no suitable habitat for the federally listed endangered Yuma Clapper Rail exists. Desert pupfish exist in drains that discharge directly into the Salton Sea. None of the five drains included in this project discharge directly into the Salton Sea and are not considered suitable habitat for the desert pupfish. The area surrounding the five drains is also not typical habitat for the Flat Tailed Horned Lizard.

IID recognizes the importance of the adjacent upland habitats for breeding migratory birds and it is anticipated that those areas will not be disturbed and will continue to exist.

Should the Army Corps of Engineers request a biological assessment, data regarding threatened and endangered species and their respective habitat will be included

H-2 All ponds are designed as flow-through systems, and will incorporate a bypass system such that no water will flow through the ponds during the cleaning process. This design will allow for water to be drained from ponds (not evaporated to dryness or stagnate thus lending to botulism) while a separate water source is present. It will also eliminate the possibility of downstream environmental impacts that could result from the silt removal operation

The five drains associated with this project have been added to the IID's Drain Water Quality Improvement Plan (DWQIP). Biological and sediment testing are included in the DWQIP's monitoring and reporting program as well as toxicity testing of the drain water. A complete copy of the DWQIP will be forwarded to USFWS

H-3 See response H-2

H-4 IID has been in contact with the U.S. Army Corps of Engineers and fully intends to comply with its process to determine if wetland delineation is required.

Letter I **California Department of Water Resources**

I-1 The correct range is 15 to 80 acres in size with capacities ranging from 30-500 acre feet.

I-2 Comment noted. Correction to the document has been made.

I-3 *IID has been working in an emergency status since the first of this year in an effort to raise existing dikes surrounding the Salton Sea in order to prevent the further inundation of property. Although the Agricultural Drain Ponding Project is not part of this emergency effort,* the intent of the project is to create a greater surface area for evaporation of drainage water to occur before the water is returned to the New or Alamo Rivers and subsequently into the Salton Sea. This text has been included in the main body of the Negative Declaration (page 3).

I-4 All ponds are designed as flow-through systems, and will incorporate a bypass system such that no water will flow through the ponds during the cleaning process. This design will allow for water to be drained from ponds and will eliminate the possibility of downstream environmental impacts that could result from the silt removal operation.

The five drains associated with this project have been added to the IID's Drain Water Quality Improvement Plan (DWQIP). Biological and sediment testing are included

in the DWQIP's monitoring and reporting program as well as toxicity testing of the drain water.

I-5 See response I-3. As previously stated, the five drains included in this project will be monitored under the DWQIP.

I-6 Unlike the Kesterson Reservoir and Tulare Lake basin, all of the proposed ponds are designed as flow-through systems and will be monitored through the DWQIP in conjunction with the RWQCB.

I-7 The potential for human contact with drain water presently exists. Creation of these ponds will not increase that potential. These ponds are merely increasing the holding time of the water in the drains before releasing it into the New or Alamo Rivers. Health warnings are presently posted regarding the hazards of fish consumption from drainage waters.

I-8 While there have been restrictions placed on this project to avoid impacts, based on the initial study we believe these impacts are not significant therefore, no mitigation is necessary. However, As stated previously (response I-4), all drains included in this project have been added to the DWQIP monitoring and reporting program in conjunction with the RWQCB's request.

I-9 Comment noted. The correct response is "yes", however, the discussion remains the same.

I-10 Comment noted. The correct response is "yes", however, the discussion remains the same.

I-11 Comment noted. However, IID believes that "maybe" is the appropriate answer because we cannot predict the number of species that <u>may</u> or <u>may not</u> be flooded or attracted to the area, or if aquatic species will establish at the site. In addition, adequate terrestrial habitat exists and will continue to exist adjacent to the pond sites.

I-12 Comment noted.

I-13 Comment noted. The correct response is "maybe", however, the discussion remains the same.

I-14 Comment noted. IID has held meetings with personnel from CDFG and USFWS to discuss the possible beneficial and negative impacts. Because these ponds have been designed as flow-through systems and have been included in the DWQIP, as well as the small scale of this project, no significant impacts are expected. IID will continue to work with USFWS to ensure that negative impacts, if any, will be kept at a level

	of insignificance
I-15	See response I-14.
Letter J	**City of Imperial**
J-1	No response necessary

Responses to Phoned Comments

David Bloxhan August 18, 1995 "Will ponds take out any cultivated farm land?"

No. All sites will be constructed in river bottom areas that historically have been idle or never developed by agriculture. These areas are mainly covered by salt cedar.

Robert Wilson August 7, 1995 "Is a mosquito problem anticipated?"

No. Ponds will be designed as flow-through systems so that water will not stagnate and lend to the breeding of mosquitos. Should a problem arise, mosquito abatement procedures will be implemented.